

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORCEPOINT LLC,
Petitioner

v.

WEBROOT, INC. AND OPEN TEXT, INC.,
Patent Owners.

IPR2023-00784
U.S. Patent No. 8,438,386

**DECLARATION OF AKSHAY S. DEORAS IN SUPPORT OF
PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF
AKSHAY S. DEORAS**

Declaration of Akshay S. Deoras in Support of Petitioner's Motion for *Pro Hac*
Vice of Akshay S. Deoras

I, Akshay S. Deoras, do hereby declare as follows:

1. I am an intellectual property litigation attorney at Kirkland & Ellis LLP and have been a practicing intellectual property litigation attorney for over 14 years.

2. I am a member in good standing of the Bars of the States of California and New York. I am also admitted to practice before the United States District Court for the Northern District of California, United States District Court for the Southern District of California, and the United States Court of Appeals for the Federal Circuit.

3. My California Bar membership number is 301962 and my New York Bar membership number is 4701082.

4. I am familiar with the subject matter of U.S. Patent No. 8,438,386 and its prosecution history and the prior art at issue in this proceeding.

5. Additionally, I have participated on behalf of Forcepoint in the district court litigation which involves U.S. Patent 8,438,386 (*Webroot, Inc. et al v. Forcepoint LLC*, No. 6:22-cv-342 (W.D. Tex.) (filed March 31, 2022) (consolidated with lead case No. 6:22-cv-243)), and in the preparation of the briefing in the currently pending *inter partes* review proceeding.

6. Given my familiarity with the underlying facts and my patent litigation experience, I have experience and expertise important to representing Forcepoint's interests in this matter.

Declaration of Akshay S. Deoras in Support of Petitioner's Motion for *Pro Hac Vice* of Akshay S. Deoras

7. I have never been suspended or disbarred from practice before any court or admission.

8. I have never had a court or administrative board deny an application for admission to practice.

9. I have never been sanctioned or cited for contempt by any court or administrative body.

10. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trial set forth in 37 C.F.R., part 42.

11. I agree to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(e).

12. In the past three years, I have applied for or appeared *pro hac vice* in the following USPTO proceedings: IPR2023-00078, IPR2023-00077, IPR2023-00031, IPR2023-00032, IPR2023-00020, IPR2023-00021, IPR2022-01572, IPR2022-01573, IPR2022-01521, IPR2022-01338, IPR2022-01298, IPR2022-01301, IPR2022-01302, IPR2022-01303, IPR2022-01304, IPR2022-01305, IPR2022-01308, IPR2022-01294, IPR2022-01266, IPR2021-00323, IPR2021-00324, IPR2021-00325, IPR2021-00124, IPR2021-00187, IPR2021-01612, IPR2021-01613, IPR2021-01517, IPR2021-01518, IPR2021-01579, IPR2021-01583, and IPR2021-01585.

Declaration of Akshay S. Deoras in Support of Petitioner's Motion for *Pro Hac*
Vice of Akshay S. Deoras

I hereby declare that all statements made herein of my own knowledge to be true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like are punishable by fine, imprisonment, or both under Section 1001 of Title 18 of the United States Code.

Respectfully submitted,

Dated: October 4, 2023

By: /Akshay S. Deoras/
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