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.

IPR2023-00786
U.S. Patent No. 10,025,928

DECLARATION OF NADIA E. HAGHIGHATIAN IN SUPPORT OF PETITIONER'S MOTION FOR PRO HACE VICE ADMISSION OF NADIA E. HAGHIGHATIAN

I, Nadia E. Haghighatian, 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 9 years.

2. I am a member in good standing of the Bar of the State of Texas. I am also admitted to practice before the United States District Courts for the Northern, Southern, Western, and Eastern Districts of Texas; the United States Court of Appeals for the Federal Circuit; and the United States Court of Appeals for the Fifth Circuit.

3. My Texas Bar membership number is 24087652.

4. I am familiar with the subject matter of U.S. Patent No. 10,025,928 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 10,025,928 (*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.

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

8. I have had an application for admission *pro hac vice* denied without prejudice due to an expired certificate of good standing, but that application was subsequently granted following submission of a renewed certificate. Other than that instance, 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 not applied for or appeared *pro hac vice* in any USPTO proceedings.

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.

Forcepoint 1012
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Respectfully submitted,

Dated: October 4, 2023

By: */Nadia E. Haghighatian/*

Nadia E. Haghighatian
KIRKLAND & ELLIS LLP
401 Congress Avenue
Austin, TX 78701
Telephone: (512) 678-9100
Facsimile: (512) 678-9101
nadia.haghighatian@kirkland.com