

IPR2023-00815; IPR2023-00816; IPR2023-00817
Patent Nos. 9,373,205, 10,657,747, and 11,373,474, respectively

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASSA ABLOY GLOBAL SOLUTIONS, INC., HID GLOBAL CORP.,
Petitioners,

v.

URBAN INTEL INC.,
Patent Owner

**DECLARATION IN SUPPORT OF
PATENT OWNER'S PRELIMINARY RESPONSES TO THE PETITIONS
FOR *INTER PARTES* REVIEW OF
U.S. PATENT NOS. 9,373,205, 10,657,747, AND 11,373,474**

I, C. Matthew Rozier, am a Partner at the law firm of Rozier Hardt McDonough PLLC, and I represent Patent Owner Urban Intel Inc. (“Urban Intel”) in the IPRs directed at U.S. Patents Nos. 9,373,205, 10,657,747, 11,373,474 (the “Urban Intel Patents”). The facts stated herein are true of my own personal knowledge, except as to any matters stated on information and belief, and as to those matters, I am informed and believe them to be true. If called as a witness in this matter, I could and would competently testify as to the matters set forth below.

1. I also represent Liberty Access Technologies Licensing LLC (“Liberty”), Urban Intel’s exclusive licensee for the Urban Intel Patents in certain litigation matters. As relevant here, those matters are:

- *Liberty Access Technologies Licensing LLC v. Marriott Int’l, Inc.*, E.D. Tex. No. 2:22-cv-00318-JRG (filed Aug. 18, 2022; the “*Marriott Litigation*”)
- *Liberty Access Technologies Licensing LLC v. ASSA ABLOY AB*, E.D. Tex. No. 2:22-cv-00507-JRG (filed December 30, 2022; the “*ASSA Litigation*”)

2. At the request of Petitioners’ counsel, Mr. Lionel Lavenue, I participated in a telephone conference on December 15, 2022.

3. During this call, Mr. Lavenue stated in clear terms that his clients, the Petitioners in these IPRs and their related entities (collectively, “ASSA”) were not interested in negotiating any payment for the demanded license to the Asserted Patents, but instead demanded a royalty-free license to the Urban Intel Patents.

4. Mr. Lavenue then informed me that if Liberty did not immediately grant the demanded royalty-free license, ASSA would “rain down an avalanche of IPRs” on the Urban Intel Patents.

5. I refused Mr. Lavenue’s demand.

I declare under penalty of perjury under the laws of the State of Georgia that the foregoing is true and correct.

Date: September 14, 2023

By: /C. Matthew Rozier/
C. Matthew Rozier
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