

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GUANGDONG LAITU IMAGING TECHNOLOGY CO., LTD. dba LEOFOTO,
Petitioner,

v.

REALLY RIGHT STUFF, LLC,
Patent Owner

U.S. Patent No. 8,398,037, EQUIPMENT SUPPORT
IPR No. 2023-00853

**SECOND UPDATED DECLARATION OF STUART B. LEIJON IN
SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE*
ADMISSION ON BEHALF OF PATENT OWNER REALLY RIGHT
STUFF, LLC
37 C.F.R. § 42.10(c)**

I, Stuart B. Leijon, do hereby declare:

1. I am an associate at the law firm of Chernoff Vilhauer LLP. Lead counsel in this matter is Kevin Russell, who is a partner with the firm Chernoff Vilhauer LLP and is registered to practice before the United States Patent & Trademark Office (USPTO) under Registration Number 38,292. With respect to this proceeding, I will work closely with Mr. Russell.
2. I hold a Juris Doctor degree from Lewis & Clark Law School, in Portland, Oregon. I hold a bachelor's degree in political science from Pacific University in Forest Grove, Oregon.
3. I have more than four years' experience in litigation, first as a law clerk and then as an attorney. Since shortly after admission to the Oregon State Bar in 2021, I have worked as a patent litigator, including on matters relating to the same field as this petition for *inter partes* review.
4. I have worked on several matters for Patent Owner Really Right Stuff, including the ongoing United States District Court case *Really Right Stuff v. Field Optics Research*, Case No. 2:20-cv-00345 (D. Utah), which also pertains to supports for optical equipment.
5. I am very familiar with U.S. Patent No. 8,398,037 and with the legal and technical subject matter and prior art discussed in Petitioner Request for

Inter Partes Review of the '037 patent, which forms the basis for this proceeding.

6. I am a member in good standing of the State Bars of Oregon and Washington, and I am admitted to practice before the United States District Court for the District of Oregon. I am admitted *pro hac vice* in the United States District Court for the District of Utah.
7. I have never been suspended, disbarred, reprimanded, or otherwise sanctioned before any court or administrative body.
8. I have never been denied admission to practice before any court or administrative body.
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 Guide and the Board's Rules of Practice for Trials in 37 C.F.R. Part 42.
11. I agree to be subject to the United States Patent and Trademark Office Code of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
12. In the last three years, I have appeared in zero proceedings before the Board. Until this IPR, I have not applied to appear in any proceedings before the Board.

13. I declare that all statements made herein of my knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful, false statements and the like so made are punishable by fine or imprisonment or both under 18 U.S.C. § 1001 and that such willful and false statements may jeopardize the validity of U.S. Patent No. 8,398,037.

Respectfully Submitted,

DATE: August 21, 2023

s/Stuart B. Leijon
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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on August 21, 2023, a complete and entire copy of this DECLARATION OF STUART LEIJON IN SUPPORT OF PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION was provided via email to the Petitioner by serving the email correspondence address of record as follows:

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Respectfully Submitted

DATE: August 21, 2023

s/Kevin Russell
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