

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**NETFLIX, INC.,**

Petitioner

v.

**VL COLLECTIVE IP, LLC.,**

Patent Owner

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IPR2023-00891  
U.S. Patent 8,605,794

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**DECLARATION OF NAVEED S HASAN**

I, Naveed, hereby declare as follows:

1. I am an attorney with Reichman Jorgensen Lehman & Feldberg, LLP, counsel for VL Collective IP, LLC (“VL Collective”) in this matter.  
  
I make this declaration of my own personal knowledge, and if compelled to testify, I could and would competently testify thereto.
2. I collected information about *inter partes* reviews (IPRs) filed by Unified Patents, LLC (“Unified”) from the Patent Trial and Appeal Case Tracking System (P-TACTS).
3. Exhibit 2023, filed with the Motion to Terminate, includes in Table I a true and correct listing of IPRs filed by Unified and terminated before issuance of a final written decision based on a joint request to terminate after March 8, 2023.
4. Table I includes the “Reason given for Request to Terminate” for each listed IPR, which was obtained from documents of the respective proceeding.
5. Exhibit 2023 further includes in Table II, a true and correct listing of IPRs filed by Unified in which a Final Written Decision or Institution Decision was issued after March 8, 2023, and a request to terminate was not filed.

6. Table II further includes information from PTACTS of whether co-pending instituted IPRs existed at the time of the Final Written Decision Institution Decision (if there is no Final Written Decision) of the respective Unified IPR for the same patents as the ones at issue in the respective Unified IPR.
7. Based on my search on PTACTS, I found that Unified has not filed an IPR since March 1, 2023.
8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31st day of May 2024.

Dated: May 31, 2024

By: /Naveed S Hasan/  
Naveed S Hasan  
PTO Reg. No. 72,688  
**Counsel for Patent Owner**