UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.; INSTAGRAM, INC.; WHATSAPP LLC; META PLATFORMS TECHNOLOGIES, LLC; AND GIPHY, INC.

Petitioners

v.

VL COLLECTIVE IP LLC

Patent Owner

Case IPR2023-00924

U.S. Patent 7,436,980

DECLARATION OF JAIME F. CARDENAS-NAVIA
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*

I, Jaime F. Cardenas-Navia, declare as follows:

1. I have been practicing law in the field of intellectual property, and particularly, patent litigation, for over nine years. Before attending law school, I worked as a Patent Examiner at the United States Patent & Trademark Office for three years (August 2007 – August 2010).

2. I am a member in good standing of the Bar of the State of New York and am admitted to practice before the United States District Courts for the Southern District of New York and the Northern District of Illinois.

3. I have been in private practice and litigating patent cases since August 2014. I have been counsel in over a dozen patent infringement cases and have represented clients in at least five United States District Courts.

4. I have never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body, nor had any court or administrative body deny my application for admission to practice.

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

6. I agree to be subject to the United States Patent and Trademark Office Rules 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).

7. In the past three (3) years, I have appeared *pro hac vice* in five proceedings before the United States Patent and Trademark Office: IPR2020-00276, IPR2022-01086, IPR2023-00628, IPR2023-00630, IPR2023-00891.

8. I am familiar with the subject matter at issue in this proceeding, including the patent, its prosecution history, and the identified references. I am counsel in the following case, which is related to and involves the same patent at issue in this proceeding: *VideoLabs, Inc. et al. v. Meta Platforms, Inc., et al., No. 22-680-JHS (D. Del.)*.

9. I hereby declare that all statements made herein of my own knowledge are 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 so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of U.S. Patent No. 7,436,980.

Dated: September 8, 2023

Respectfully submitted,

/s/ Jaime F. Cardenas-Navia

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on September 8, 2023, a copy of the foregoing document was served by email to counsel for Petitioners:

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