UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHARKNINJA, INC.,
SHARKNINJA OPERATING LLC.,
SHARKNIJA MANAGEMENT LLC, AND
SHARKNINJA SALES COMPANY,
Petitioners,

v.

DYSON TECHNOLOGY LIMITED,
Patent Owner.

Case No. IPR2023-01322

U.S. PATENT NO. 10,422,687

DECLARATION OF CAITLIN DEAN IN SUPPORT OF PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF CAITLIN DEAN

I, Caitlin Dean, 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 six years representing clients in patent litigation matters in various United States Federal District Courts, the United States Court of Appeals for the Federal Circuit, and the United States International Trade Commission. Among my experience in patent litigation matters, I have been counsel at trial, *Markman* hearings, patent summary judgment proceedings, and other patent-related hearings and pleadings concerning, *inter alia*, patent validity and infringement issues.

2. I am counsel for Dyson Technology Limited and Dyson Inc. in three co-pending litigation matters against various SharkNinja and Omachron entities which involve a combined total of 21 patents related to vacuum cleaners: *SharkNinja Operating LLC et al v. Dyson, Inc. et al*, 1-23-cv-12372 (D. Mass); *Dyson Inc. et al v. SharkNinja, Inc. et al*, 2-24-cv-00386 (EDTX); and *Certain Surface Cleaning Devices and Components Thereof*, Inv. No. 337-TA-1404 (ITC).

3. I am a member in good standing of the bars of the State of Texas and the State of New York.

4. My New York Bar membership number is 6067441. My Texas Bar membership number is 24109797.

5. I am also admitted to practice before the United States District Courts

for the Southern District of New York, Eastern District of New York, Southern District of Texas, Eastern District of Texas, District of Colorado, and Western District of Wisconsin as well as the United States Court of Appeals for the Federal Circuit.

6. I am familiar with the subject matter of U.S. Patent No. 10,433,687 and its prosecution history and the prior art at issue in this proceeding. I participated in the preparation of Patent Owner's Sur-Reply (Paper No. 31) and have reviewed all of the Papers and Exhibits in this proceeding. I am also Patent Owner Dyson Technology Limited's counsel in its co-pending district court litigation against Petitioner SharkNinja, Inc. involving the patent at issue in this proceeding, *Dyson, Inc. v. SharkNinja, Inc.*, 2:24-cv-00386-JRG (E.D. Tex.). As litigation counsel for Patent Owner, I have been actively involved in all aspects of its district court litigation.

7. Given my familiarity with the underlying facts and my patent litigation experience, I have experience and expertise important to representing Dyson's interest in this matter.

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

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 Conduct 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 *pro hac vice* in 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.

Date: November 20, 2024

Respectfully submitted,

/s/ Caitlin Dean

KIRKLAND & ELLIS LLP
601 Lexington Ave.
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
caitlin.dean@kirkland.com