

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAFE HAVEN WILDLIFE REMOVAL AND
PROPERTY MANAGEMENT EXPERTS LLC,
Petitioner,

v.

MERIDIAN WILDLIFE SERVICES LLC,
Patent Owner.

Case: IPR2023-01340
Patent No. 9,943,073

DECLARATION OF MICHAEL J. CHAMBERLAIN

1. My name is Michael J. Chamberlain, Ph.D., and I am the Terrell Distinguished Professor of Wildlife Ecology and Management in the Warnell School of Forestry and Natural Resources at the University of Georgia. In 2022, I provided declaration testimony in support of Petitions for *inter partes* review (“IPR”) filed by Meridian Wildlife Services, LLC (“Meridian”) against several patents owned by Safe Haven Wildlife Removal and Property Management Experts LLC (“Safe Haven”)—U.S. Patent No. 10,251,374 (Case IPR2022-01253), U.S. Patent No. 10,729,108 (Case IPR2022-01254), and U.S. Patent No. 11,064,683 (Case IPR2022-01340).

2. I have been informed by counsel for Meridian for that petitions for IPR have been filed by Safe Haven against U.S. Patent No. 9,943,073 (Case IPR2023-01340) and U.S. Patent No. 10,154,663 (Case IPR2023-01341) (collectively “the Safe Haven Petitions”). I have also been informed by counsel for Meridian that U.S. Patent Nos. 9,943,073 and 10,154,663 are owned by Meridian.

3. I was unaware of the Safe Haven Petitions until being informed of their existence by counsel for Meridian. I have never provided testimony in support of the Safe Haven Petitions and I was never asked by Safe Haven (or its counsel) to do so. I was also never asked by Safe Haven if I would be willing to appear for cross-examination in relation to the Safe Haven Petitions. Likewise, I have never

been engaged by Safe Haven, compensated by Safe Haven, or otherwise provided consulting services for Safe Haven.

4. For at least these reasons, I am unwilling to participate in a deposition or otherwise sit for cross-examination in relation to any of my prior IPR testimony that has been (or will be) submitted by Safe Haven in support of the Safe Haven Petitions. Furthermore, my contractual obligations to Meridian constrain me from participating in any such deposition or cross-examination.

5. I declare that all statements made herein on my own 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 § 1001 of Title 18 of the United States Code.

Executed on: November 29, 2023

X 

Michael Chamberlain