

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EXPERIAN INFORMATION SOLUTIONS, INC.,
Petitioner,

v.

DYNAPASS IP HOLDINGS LLC,
Patent Owner.

IPR2023-01406
U.S. Patent No. 6,993,685

**DECLARATION OF ROGER SCOTT FELDMANN
IN SUPPORT OF PETITIONER'S
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Roger Scott Feldmann, hereby declare the following:

1. I am a member in good standing of the Bar of the State of California.

I have also been admitted to practice in the following courts: United States Court of Appeals for the Federal Circuit; United States Court of Appeals for the Ninth Circuit; United States Court of Appeals for the Seventh Circuit; United States District Court for the Northern District of California; United States District Court for the Eastern District of California; United States District for the Central District of California; United States District Court of Arizona; and United States District Court of Colorado.

2. I have never been suspended or disbarred from practice before any court or administrative body.

3. I have never had an application for admission to practice before any court or administrative body denied.

4. No sanction or contempt citation has been imposed against me by any court or administrative body.

5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of Title 37 of the Code of Federal Regulations.

6. I will be subject to the USPTO 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. Within the past three years, I have not applied to appear *pro hac vice* before the USPTO Patent Trial and Appeal Board.

8. I have been practicing law with experience in litigation for 30 years, and have been practicing in the field of intellectual property during that time. I regularly litigate intellectual property cases in various federal U.S. District Courts, including the United States District Court for the Eastern District of Texas. I have appeared and argued appeals before both the California Court of Appeals, and the U.S. Court of Appeals for the Federal Circuit. I have substantial experience in motions to dismiss, discovery, summary judgment, jury trials, and appeals.

9. I have particular experience and familiarity with the substance and technical issues involved in this *inter partes* review. I represent Petitioner as lead counsel in *Dynapass IP Holdings LLC v. Experian Information Services, Inc.*, No. 2:23-cv-00066, pending in the United States District Court for the Eastern District of Texas.¹ That case involves Patent Owner asserting the patent at-issue in this *inter partes* review (i.e., U.S. Patent No. 6,993,685) against Petitioner.

¹ Patent Owner/Plaintiff misidentified Experian Information Solutions, Inc., as Experian Information “Services,” Inc., in its complaint.

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 were 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 State Code and that such willful false statements may jeopardize the validity of the application or any patents issued thereon.

January 4, 2024

Respectfully submitted,

/R. Scott Feldmann/

R. Scott Feldmann

sfeldmann@bakerlaw.com

BAKER & HOSTETLER LLP

600 Anton Boulevard, Suite 900

Costa Mesa, CA 92626

Telephone: 714.754.6600

Facsimile: 714.754.6611