DECLARATION OF PAUL A. KROEGER IN SUPPORT OF MOTION FOR *PRO HAC VICE ADMISSION*

I, Paul A. Kroeger, hereby declare:

1. I am an attorney at the firm of Russ August & Kabat.

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

3. I have not been suspended or disbarred from practice before any court or administrative body.

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

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

6. 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 Code of Federal Regulations.

7. I acknowledge that I will be subject to the U.S. Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101, *et seq.* and to the Office's disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. During the last three years, I have applied to appear *pro hac vice* in nine (9) proceedings before the Office: (1) *NetApp, Inc. v. Proven Networks, LLC*, IPR2022-00644; (2) *Nokia of America Corporation v. Alexander Soto et al*, IPR2023-00680; (3) *Nokia of America Corporation v. Alexander Soto et al*,

Volume Distributor, Inc., Ex. 1015
simplehuman, LLC v. Volume Distributor, Inc., IPR2024-00050

IPR2023-00681; (4) *Nokia of America Corporation v. Alexander Soto et al*, IPR2023-00682; (5) *Infinera Corporation v. Alexander Soto et al*, IPR2023-00834; (6) *Infinera Corporation v. Alexander Soto et al*, IPR2023-00835; (7) *Infinera Corporation v. Alexander Soto et al*, IPR2023-00838; (8) *Nokia of America Corporation v. Soto et al*, IPR2023-00960; and (9) *Western Digital Technologies, Inc., v. Longitude Licensing, Ltd.,* IPR2023-01200. The Office granted these motions to appear *pro hac vice*.

9. I am an experienced patent litigation attorney. I have practiced patent litigation since 2003 and have litigated numerous patent infringement litigation matters in the U.S. district courts. I have experience in trials and *Markman* hearings.

10. I have an established familiarity with the subject matter in this proceeding as a result of my role in the development and preparation of Petitioner's positions on the validity of the claims of the '165 patent and related patents, which overlap with the grounds for unpatentability presented in the Petition for *Inter Partes* Review in IPR2024-00050.

11. I 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 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 18 U.S.C. § 1001.

Date: May 15, 2024

/s/ Paul A. Kroeger

Paul A. Kroeger
Russ August & Kabat
12424 Wilshire Blvd., 12th Fl.
Los Angeles, CA 90025
Phone: (310) 826-7474
Fax: (310) 826-6991
pkroeger@raklaw.com

Volume Distributor, Inc., Ex. 1015
simplehuman, LLC v. Volume Distributor, Inc., IPR2024-00050