

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRUCTURAL WRAP, LLC,
Petitioner

v.

SYSTEM STORMSEAL PTY LTD, STORMSEAL USA, LLC,
Patent Owner

Case IPR2024-00084
Patent 11,168,484

DECLARATION OF STEPHEN A. MANISCALCO

I, Stephen A. Maniscalco, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am a counsel at the law firm of Groombridge, Wu, Baughman & Stone LLP.
2. I provide this Declaration in connection with the Petition for *Inter Partes* Review of U.S. Patent No. 11,168,484 in the above-captioned *Inter Partes* Review proceeding that is being requested at the U.S. Patent and Trademark Office by Petitioners under 35 U.S.C. §§ 311-319, 37 C.F.R. § 42. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.
3. EX1016 hereto is a true and correct copy of the YouTube video entitled “Tarp Your Roof,” available at <https://www.youtube.com/watch?v=2PKUMDmVRMY>. On August 15, 2023, I went to <https://www.youtube.com/watch?v=2PKUMDmVRMY> using a web browser. Using the tool Snagit, I recorded my computer screen as the YouTube video played. On October 22, 2023, I directed my colleague Bernard B. Pound, Litigation Case Manager/Trial Specialist, to divide the video file into six parts, due to its large file size. Aside from this division, no other alterations have been made, and the screen recording accurately reflects the YouTube video.
4. EX1022 hereto is a true and correct copy of an email I sent to Stormseal’s counsel on October 26, 2023. The exhibit is a print-out of the email, and it

accurately reflects the contents of my email. An exhibit label and a page number have been added to the bottom of EX1022 but no other alterations have been made.

5. EX1023 hereto is a true and correct copy of a redacted version of Plaintiffs System Stormseal Pty Ltd and Stormseal USA, LLC's Responses and Objections to Defendant Structural Wrap, LLC's First Set of Interrogatories to Plaintiffs (Nos. 1-14), dated June 12, 2023, served in the District Court litigation, *System Stormseal Pty Ltd et al. v. Structural Wrap, LLC et al.*, No. 9:22-cv-81726 (S.D. Fla.). I am counsel of record for Structural Wrap, LLC in that case, and I received this document from Stormseal's counsel on June 12, 2023. Thereafter, I added redactions to the document. Counsel for Stormseal confirmed to me via email that this redacted version contains no confidential information. An exhibit label and page numbers have been added to the bottom of all pages of EX1023 but no other alterations have been made.

6. EX1049 hereto is a true and correct copy of a letter from Google Custodian of Records Ra Bacchus to Kevin P. Jacobs, dated October 20, 2023, and Certificate of Authenticity by Google Custodian of Records Ra Bacchus, dated October 26, 2023, which were produced by Google LLC in response to a third-party subpoena that Structural Wrap served on Google LLC. I received EX1049 from Google Custodian of Records Ra Bacchus on October 26, 2023. An exhibit label and page

numbers have been added to the bottom of all pages of EX1049 but no other alterations have been made.

7. EX1050 hereto is a true and correct copy of a pdf version of a .csv file entitled “Video Metadata,” produced by Google LLC on October 20, 2023, in response to a third-party subpoena that Structural Wrap served on Google LLC. I received an electronic .zip folder of documents from Google LLC on October 20, 2023. The .zip folder contained a .csv file entitled “Video Metadata,” along with other electronic documents. I saved the .csv file entitled “Video Metadata,” as a pdf document. An exhibit label and page number have been added to the bottom of EX1050 but no other alterations have been made.

8. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both. I make this declaration of my own personal knowledge, and all statements are true. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of October, 2023, at New York, New York

/Stephen A Maniscalco/

Stephen A Maniscalco