

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 CHIEH-MING HSU

I, Chieh-Ming Hsu, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am an associate 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. EX1037 hereto is a true and correct copy of a transcript of EX1016, a screen recording of a YouTube video entitled “Tarp Your Roof.” I submitted a request to create a transcript to the court reports at Planet Depos on September 11, 2023, and I received the transcript on September 18, 2023. I reviewed the transcript and confirmed that it accurately reflects the content of EX1016. An exhibit label and page numbers have been added to the bottom of all pages of EX1037 but no other alterations have been made.
4. EX1038 hereto is a true and correct excerpted copy of the book *Handbook of Plastic Films*, Rapra Technology Limited (2003). I obtained a copy of the book from Sayem Osman on October 12, 2023 after he mailed the book to me. After receiving the book, I directed Bijan Khaghani, paralegal, to make scanned copies of the book. I reviewed the scanned copy and confirmed that it accurately reflects

the original book. An exhibit label and page numbers have been added to the bottom of all pages of EX1038 but no other alterations have been made.

5. EX1039 hereto is a true and correct excerpted copy of the book *Plastics Films* by John H. Briston, Third Edition (1989). I obtained a copy of the book from Sayem Osman on October 12, 2023 after he mailed the book to me. After receiving the book, I directed Bijan Khaghani, paralegal, to make scanned copies of the book. I reviewed the scanned copy and confirmed that it accurately reflects the original book. An exhibit label and page numbers have been added to the bottom of all pages of EX1039 but no other alterations have been made.

6. EX1045 hereto is a true and correct copy of the Library of Congress borrow record for the book *Handbook of Plastic Films*, Rapra Technology Limited (2003). I obtained a copy of the record from Sayem Osman on October 12, 2023 after he mailed the record to me. After receiving the record, I directed Bijan Khaghani, paralegal, to make scanned copies of the record. I reviewed the scanned copy and confirmed that it accurately reflects the original record. An exhibit label and page numbers have been added to the bottom of all pages of EX1045 but no other alterations have been made.

7. EX1046 hereto is a true and correct copy of the Library of Congress borrow record for the book *Plastics Films* by John H. Briston, Third Edition (1989). I obtained a copy of the record from Sayem Osman on October 12, 2023 after he

mailed the record to me. After receiving the record, I directed Bijan Khaghani, paralegal, to make scanned copies of the record. I reviewed the scanned copy and confirmed that it accurately reflects the original record. An exhibit label and page numbers have been added to the bottom of all pages of EX1046 but no other alterations have been made.

8. EX1047 hereto is a true and correct excerpted copy of the book *Plastics Films* by John H. Briston, Third Edition (1990 Reprint). I obtained a copy of the book from Dr. Yash P. Khanna after he mailed the book to me. After receiving the book, I directed Bijan Khaghani, paralegal, to make scanned copies of the book. I reviewed the scanned copy and confirmed that it accurately reflects the original book. An exhibit label and page numbers have been added to the bottom of all pages of EX1047 but no other alterations have been made.

9. 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.

10. 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.

/Chieh-Ming Hsu/

Chieh-Ming Hsu