UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AFFORDABLE WIRE MANAGEMENT, LLC,
Petitioner,
v.

CAMBRIA COUNTY ASSOCIATION FOR THE BLIND
AND HANDICAPPED, INC.,
Patent Owner.

Case IPR2024-00139
Patent 10,177,551 B1

DECLARATION OF CARSON M. SHEA IN SUPPORT OF UNOPPOSED MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT OWNER

I, Carson M. Shea, do hereby declare:

1. I am a member of the law firm Eckert Seamans Cherin & Mellott, LLC, which represents the Patent Owner Cambria County Association for the Blind and Handicapped, Inc. ("Patent Owner") in this *Inter Partes* Review proceeding. Lead counsel on behalf of Patent Owner is Daniel J. Melman, who is registered to practice before the United States Patent and Trademark Office and holds Registration No. 55,451. Backup counsel in this proceeding is Theodore Y. McDonough, who is registered to practice before the United States Patent and Trademark Office and holds Registration No. 71,981.

2. I am an experienced litigating attorney and have been involved in numerous complex litigations in state and federal courts involving patents, intellectual property, and trade secrets. I have tried cases in federal and state courts, and have represented clients in appeals before the federal and state appellate courts. I have an established familiarity with the subject matter in this proceeding, including, but not limited to, the papers and exhibits filed with the Board to date in this proceeding, U.S. Patent No. 10,177,551 (the "'551 Patent"), the technology related to the '551 Patent, the parties to this proceeding, and the factual and legal issues that are the subject of this proceeding.

3. I also have an established familiarity with the subject matter in the related litigation before the United States District Court for the District of

Delaware, captioned *Cambria County Association for the Blind and Handicapped, Inc. v. Affordable Wire Management, LLC*, No. 1:23-cv-00080-SRF (D. Del.), in which Patent Owner has asserted, *inter alia*, patent infringement claims against Petitioner related to the '551 Patent and U.S. Patent No. 11,349,291. *See* Patent Owner's Mandatory Notices (Paper No. 6).

4. I have also discussed and analyzed the technology of the '551 Patent with the client, as well as with outside consultants and experts. Working closely with Mr. Melman and Mr. McDonough, I will be substantially involved in all aspects of this proceeding moving forward. The client desires, and has a need, to be represented in these proceedings by a litigation attorney with my level of experience.

5. I am a member in good standing of the Bar of the Commonwealth of Massachusetts and the Bar of the State of Rhode Island, as well as the United States District Court for District of Massachusetts, the United States District Court for the District of Rhode Island, and the United States Court of Appeals for the First Circuit.

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

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

8. I have never been sanctioned or cited for contempt by any court or administrative body.

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

10. 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).

11. I have not applied to appear pro hac vice before the Office in any matter in the last three years.[1]

12. 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 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 States Code.

[1] I am contemporaneously filing a *pro hac vice* motion in another IPR proceeding, IPR2024-00178, that Petitioner in the present proceeding has filed challenging the claims of U.S. Pat. No. 11,349,291. *See* Patent Owner's Mandatory Notices (Paper No. 6).

Dated: September 5, 2024

/ *Carson M. Shea* /
Carson M. Shea
Eckert Seamans Cherin & Mellott, LLC
Two International Place, 16th Floor
Boston, MA 02110
Email: cshea@eckertseamans.com
Tel: 617.342.6830
Fax: 617.342.6899

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 5th day of September, 2024, a true and correct copy of the foregoing **DECLARATION OF CARSON M. SHEA IN SUPPORT OF UNOPPOSED MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT OWNER** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

KCAmendt@mintz.com;
WSDixon@mintz.com;
RCSweeney@mintz.com;
CAB_AWM@mintz.com.

Dated: September 5, 2024

/ *Daniel J. Melman* /
Daniel J. Melman (Reg. No. 55,451)