

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HILTI AKTIENGESELLSCHAFT

Petitioner,

v.

SPECIFIED TECHNOLOGIES INC.,

Patent Owner.

Case No. IPR2024-00192

U.S. Patent No. 9,157,232

DECLARATION OF MICHAEL A. DORFMAN

I, Michael A. Dorfman of Chicago, Illinois declare:

1. I am a Principal with the law firm of Gardella Grace, P.A., counsel to Petitioner in this *inter partes* review. I make this declaration in support of the Petition being filed simultaneously herewith.

2. Exhibit 1009 in this proceeding is a true and correct copy of Patent Owner's Opening Claim Construction Brief served in *Hilti Aktiengesellschaft v. Specified Technologies, Inc.*, 22-cv-1248-CJB (D. Del.) (the "District Court Litigation").

3. Exhibit 1010 in this proceeding is a true and correct copy of a printout of the following URL, which I last accessed on November 14, 2023:
<https://www.stifirestop.com/legal/patents>

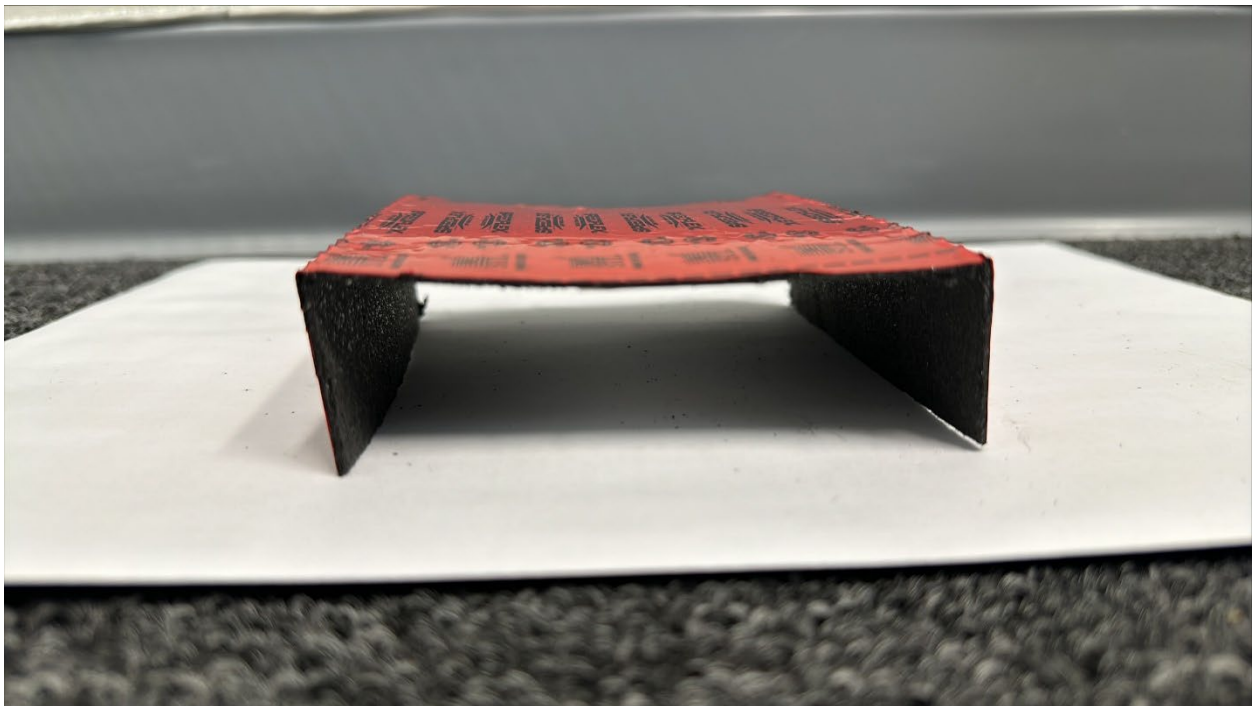
4. Exhibit 1011 in this proceeding is a true and correct copy of a Product Data Sheet for Patent Owner's SpeedFlex Track Top Gasket, which I downloaded from Patent Owner's website in or around September 2022.

5. Exhibit 1013 in this proceeding is a true and correct copy of Patent Owner's Supplemental Statement of Asserted Claims and Infringement Contentions of Specified Technologies, Inc. as served by Patent Owner in the District Court Litigation.

6. Exhibit 1014 in this proceeding is a true and correct copy of Patent Owners's [STI's] Objections and Responses to Hilti's Second Set of Interrogatories as served by Patent Owner in the District Court Litigation.

7. Exhibit 1015 in this proceeding is a true and correct copy of the *Sotera* Stipulation served on Patent Owner in the District Court Litigation.

8. Below is a photograph of a product sold by Patent Owner with the model number TTG350F, which I took on or about November 7, 2023. I personally directed the purchase of the TTG350F shown in the photograph below.



9. Below is a photograph showing the top view of the product sold by Patent Owner with the model number TTG350F, which I took on November 16, 2023.



10. Exhibit 1016 in this proceeding is a true and correct copy of the Installation Instructions included in the box with the purchased TTG350F referenced in paragraph 8 above.

I hereby declare that all statements made are of my own knowledge, are true, and that all statements made on information and belief are believed to be true. I further declare 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 the Title 18 of the United States Code and that such willful false statements may jeopardize the validity of this proceeding.

November 17, 2023



Michael A. Dorfman