UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner,

v.

VIDEO SOLUTIONS PTE. LTD.,

Patent Owner.

IPR2024-00194
U.S. Patent No. 9,204,099

DECLARATION OF TODD VARE IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION

DECLARATION OF TODD VARE IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION

I, Todd Vare, being duly sworn and upon oath, hereby attest to the following:

1. I am a partner at Barnes & Thornburg LLP, where I work closely with Christopher C. Hoff, USPTO Registration No. 67,738, who has appeared as lead counsel for Patent Owner Video Solution Pte. Ltd., in IPR2024-00194 and IPR2024-00695.

2. I am a member in good standing of the Bars of the States of Indiana and Illinois. I am also admitted to practice before the Supreme Court of the United States, before the United States Courts of Appeal for the Second, Seventh, and Federal Circuits, before the United States District Courts for the Northern District of Illinois, the Southern and Northern Districts of Indiana, and the Eastern District of Texas, and in several other district courts on a *pro hac vice* basis.

3. I have nearly 30 years of experience litigating patent cases in various United States District Courts and before the Federal Circuit. I am an experienced patent litigation attorney.

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

5. I have never had an application for admission to practice before any court or administrative body denied with or without prejudice.

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

7. 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 37 C.F.R.

8. 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).

9. In the last three years (June 4, 2021, to present), I have applied for and been granted *pro hac vice* admission before the Office in IPR2022-00847, IPR2022-00848, IPR2023-00123, IPR2023-0129, IPR2023-00213, and IPR2023-00214 on behalf of CAO Lighting, Inc. I had also been previously admitted *pro hac vice* in IPR2018-01412 and IPR2018-01525 on behalf of Patent Owner Farms Technology, LLC.

10. I have particular experience and familiarity with the '099 patent and the substantive and technical issues in this IPR proceeding, including with the documents of record in this proceeding. I represent the Patent Owner in the concurrent litigation with Petitioner involving the '099 patent, *Video Solutions Pte. Ltd. v. Cisco Systems, Inc.*, 2-23-cv-00222 (E.D. Tex.). I have extensively reviewed the '099 patent and gained significant familiarity with the issues in this

litigation, including claim construction issues, which overlap with the corresponding issues in this IPR proceeding. Furthermore, I have conducted a detailed reviewed of and understand the Petition in this IPR, the supporting Declaration of A.L. Narasimha Reddy, Ph.D (Ex. 1003), and the Board's Decision instituting *Inter Partes* Review of the '099 patent. Based upon my work with the Patent Owner and with the '099 patent (both in the concurrent litigation and in my review of this IPR proceeding), I have a high degree of familiarity with, and particularly understand, the prior art and claim construction issues relevant to Petitioner's proposed invalidity grounds and the Board's Decision. Accordingly, I have familiarity with the specific subject matter at issue in this proceeding.

I hereby 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 are 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.

Respectfully submitted,

Date: 6/4/2024

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