

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.
Petitioner

v.

MOTION OFFENSE, LLC
Patent Owner

IPR2024-00287
U.S. Patent No. 11,611,520

**DECLARATION OF TODD C. ZUBLER IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Todd C. Zubler, declare as follows:

1. I obtained a B.A. from Washington University in 1992, an M.Sc. from Oxford University in 1994, and a J.D. from Harvard Law School in 1996. I am a partner at the law firm of Wilmer Cutler Pickering Hale & Dorr LLP in Washington, DC.

2. I have been practicing law for over 28 years. My practice during much of that time has focused on the field of intellectual property, and particularly, patent litigation.

3. I am a member in good standing of the Bar of the District of Columbia, and am admitted to practice before the Supreme Court, the United States Courts of Appeals for the First, Fourth, Fifth, Seventh, Eighth, Ninth, Tenth, District of Columbia, and Federal Circuits, and the United States District Courts for the District of Columbia, the Northern District of Indiana, the Southern District of Indiana, and the Eastern District of Texas.

4. My District of Columbia Bar membership number is 459216.

5. I have never been suspended, disbarred, sanctioned or cited for contempt by any court or administrative body.

6. I have never had a court or administrative body deny my application for admission to practice.

7. I have never had any sanctions or contempt citations imposed on me by any court or administrative body.

8. I have read and will comply with Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of Title 37 of the C.F.R.

9. I agree to be subject to the United States Patent and Trademark Office 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).

10. I have appeared *pro hac vice* in the following proceeding before the United States Patent and Trademark Office in the last three years: IPR2021-00346 (*Intel Corp. v. ParkerVision Inc.*).

11. I have also appeared *pro hac vice* in the following proceedings before the United States Patent and Trademark Office: IPR2020-01265 (*Intel Corp. v. ParkerVision, Inc.*), IPR2020-01302 (*Intel Corp. v. ParkerVision, Inc.*), IPR2018-01326 (*Intel Corp. v. Qualcomm Inc.*), IPR2018-01327 (*Intel Corp. v. Qualcomm Inc.*), IPR2018-01328 (*Intel Corp. v. Qualcomm Inc.*), IPR2018-01329 (*Intel Corp. v. Qualcomm Inc.*), IPR2018-01330 (*Intel Corp. v. Qualcomm Inc.*), IPR2018-01340 (*Intel Corp. v. Qualcomm Inc.*).

12. I have represented parties in patent litigation cases in the United States District Courts for the District of Delaware, the Eastern District of Texas, the Western District of Washington, the Western District of Pennsylvania, and the District of Oregon, and in the International Trade Commission, among other jurisdictions. Those cases have involved, among other issues, issues involving Patent Office rules, regulations, and procedures, including inequitable conduct, prosecution history disclaimer, and *ex parte* reexaminations. *See, e.g., Microlinc, LLC v. Intel Corp. et al.*, No. 2:07-cv-488 (E.D. Tex.) (*ex parte* reexamination); *In the Matter of Certain NOR and NAND Flash Memory Devices and Products Containing the Same*, Inv. No. 337-TA-560 (inequitable conduct).

13. I have represented parties in patent appeals to the United States Court of Appeals for the Federal Circuit in at least seven cases, including *Bancorp Services, LLC v. Hartford Life Ins. Co.*, No. 03-1181 (Fed. Cir.); *MBO Laboratories, Inc. v. Becton Dickinson & Co.*, No. 2008-1288 (Fed. Cir.); *Organic Seed Growers and Trade v. Monsanto Co.*, No. 2012-1298; *X2Y Attenuators, LLC v. Intel Corp.*, No. 2018-2248 (Fed. Cir.).

14. I am familiar with the subject matter at issue in this proceeding. I have reviewed U.S. Patent No. 11,611,520 (the “’520 patent”), which is being challenged in this proceeding, as well as its file history, the Petition, the Institution Decision,

Patent Owner's Response, and the other filings and exhibits in this proceeding. I have also reviewed and am familiar with the relevant prior art.

15. 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.

Respectfully Submitted,

Dated: December 24, 2024

/Todd C. Zubler/

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