

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLUIDMASTER, INC.

Petitioner,

v.

DANCO, INC.,

Patent Owner

IPR2024-00635
U.S. Patent No. 10,934,698 B1

**DECLARATION OF RANJINI ACHARYA IN SUPPORT
OF PETITIONER'S MOTION FOR ADMISSION
PRO HAC VICE OF RANJINI ACHARYA**

I, Ranjini Acharya, declare as follows:

1. I am a member in good standing of the Bar of the State of California as well as the following Federal Courts: U.S. Court of Appeals for the Federal Circuit; U.S. District Court for the Northern, Eastern, and Central Districts of California; and U.S. District Court for the District of Colorado

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

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

4. I have had no sanctions or contempt citations imposed against me by any court or administrative body.

5. I have read and will comply with the Office Patent Trial Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37 Code of Federal Regulations.

6. I agree to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I am familiar with the subject matter of U.S. Patent No. 9,139,993 B1 ("the '993 patent") at issue in this proceeding, including its prosecution history and

the scientific field to which the '993 patent relates. I have worked on preparing and reviewing material submitted in this proceeding, through which I have developed a thorough understanding of the '993 patent, the relevant art, and the scientific field.

8. I am an experienced patent litigator with over 15 years in private practice litigating patent lawsuits in the US and abroad, including five years as a partner at Pillsbury Winthrop Shaw Pittman LLP. I have over 11 years of experience representing clients in patent infringement matters at trial, in summary judgment proceedings, and in *Markman* hearings. I have been counsel in dozens of patent infringement cases, and I have represented clients in multiple United States District Courts. Additionally, I have experience advising clients on the validity and infringement of patents, working with experts, and developing strategies related to the enforcement of patents.

9. I am especially familiar with the subject matter at issue in these proceedings because I am counsel of record and represent Petitioner in the related district court proceedings, *Danco, Inc. v. Fluidmaster, Inc.*, Case No. 8:23-cv-01156-AB (DFMx), filed in the United States District Court for the Central District of California, concerning U.S. Patent No. 9,103,105 (the subject of IPR2024-00634), U.S. Patent No. 9,139,993 (the subject of IPR2024-00634), and U.S. Patent No. 10,934,698 (the subject of IPR2024-00635). Moreover, Petitioner in

those proceedings has a need to have me, as counsel of record in the co-pending district court litigation, be involved in these proceedings.

10. 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 all statements herein are made with knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Date: April 1, 2024

Respectfully submitted,

By: /Ranjini Acharya/
Ranjini Acharya
Pillsbury Winthrop Shaw Pittman LLP
2550 Hanover Street
Palo Alto, CA 94304-1115
Telephone: (650) 233-4085
Facsimile: (650) 233-4545
ranjini.acharya@pillsburylaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 1, 2024, a true and correct copy of the foregoing **DECLARATION OF RANJINI ACHARYA IN SUPPORT OF PETITIONER’S MOTION FOR ADMISSION *PRO HAC VICE* OF RANJINI ACHARYA** is being served via electronic mail on the following attorneys of record:

Lead Counsel	Jason M. Perilla	j.perilla@pkhip.com
Back Up Counsel	Kenneth A. Knox	k.knox@pkhip.com
Back Up Counsel	Eric G. Maurer (<i>Pro Hac Vice</i> Application Forthcoming)	e.maurer@pkhip.com

By: /Carolyn S. Toto/
Carolyn S. Toto
(Reg. No. 56,817)
Lead Counsel

Counsel for Petitioner