DECLARATION OF DENA CHEN IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION

I, Dena Chen, declare as follows:

1. I am a member in good standing of the Bar of California as well as the U.S. District Court for the Northern District of California, U.S. District Court for the Central District of California, U.S. District Court for the Southern District of California, U.S. District Court for the Eastern District of Texas, and the Federal Circuit Court of Appeals.

2. I have not 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. No sanction or contempt citation has been imposed against me by any court or administrative body.

5. 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.

6. 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).

7. I have applied to appear pro hac vice in the following proceedings: IPR2023-00778, IPR2024-00667 and IPR2024-00668. I am not aware of having applied to appear *pro hac vice* before the Office in any other proceeding in the last three (3) years.

8. I am an experienced litigation attorney with experience with complex litigation in both state and federal courts. I am familiar with the subject matter at issue in this proceeding, including the prior art on which Petitioner relies in this request and U.S. Patent No. 6,671,648. I have also reviewed the pertinent issues of claim construction that have been briefed in this proceeding.

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements are 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 18 U.S.C. § 1001.

I declare under penalty of perjury, under the laws of the United States of

America, that the foregoing is true and correct. Executed this 25th day of October 2024, in Palo Alto, California.

/ Dena Chen /

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