

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CAMBRIDGE MOBILE TELEMATICS, INC.
Petitioner

v.

SFARA, INC.
Patent Owner

Case IPR2024-00952
U.S. Patent No. 8,989,952

DECLARATION OF TAYLOR LEPORE

I, Taylor Lepore, make this declaration in connection with the proceedings identified above.

1. I am over the age of eighteen and am competent to make this declaration. I provide this declaration based upon my personal knowledge, except where noted. I would testify to the facts in this declaration under oath if called upon to do so.

2. I am an associate at Daignault Iyer LLP.

3. I have worked on behalf of Sfara, Inc. in IPR2024-00952 and IPR-00966.

4. I have also worked on behalf of Sfara, Inc. in *Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, No. 3:23-cv-01368 (D.N.J) (“the Litigation”).

5. In the Litigation, Cambridge Mobile Telematics, Inc. (“CMT”) served its Invalidity Contentions on October 26, 2023, filed proposed Supplemental Invalidity Contentions on July 10, 2024, and filed its proposed Second Supplemental Invalidity Contentions on August 12, 2024.

6. In the Litigation, Sfara, Inc. (“Sfara”) served its preliminary infringement contentions on August 21, 2023, and its amended infringement contentions on May 31, 2024.

7. Exhibit 2008 filed herewith is a true and correct copy of CMT’s Invalidity Contentions, served October 26, 2023, in the Litigation. The entirety of these invalidity contentions, including all exhibits, directed to U.S. Patent No. 8,989,952 (“the ’952 Patent,” the subject of IPR2024-00952) and U.S. Patent No. 9,333,946 (“the ’946 patent,” the subject of IPR2024-966) at issue in the Litigation, totals 3552 pages.

8. Exhibit 2009 filed herewith is a true and correct copy of Exhibit A-01 to CMT's Invalidity Contentions, served October 26, 2023, in the Litigation.

9. Exhibit 2010 filed herewith is a true and correct copy of Exhibit A-02 to CMT's Invalidity Contentions, served October 26, 2023, in the Litigation.

10. As of today, the parties in the Litigation have exchanged and responded to 65 interrogatories.

11. As of today, CMT served, and Sfara has responded to, 300 Requests for Admission.

12. As of today, the parties in the Litigation have exchanged and responded to 307 requests for production, including producing 15,839 documents totaling over 140,000 pages by CMT and 3,307 documents totaling over 37,000 pages by Sfara.

13. As of today, the parties in the Litigation have taken 20 depositions, including six third-party depositions, and two expert depositions regarding claim construction of the '952 and '946 Patents, with at least four more depositions still to be taken by the close of fact discovery.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 17, 2024.

By: /Taylor Lepore/
Taylor Lepore