

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

POSCO FUTURE M CO., LTD.,
Petitioner,

v.

TIAX LLC,
Patent Owner.

Case No. IPR2024-01229
Patent 9,391,317

DECLARATION OF MICHAEL A. OBLON

I, Michael A. Oblon, declare as follows:

1. I am an attorney with the firm Jones Day, representing Petitioner POSCO Future M Co., Ltd. in this proceeding. I have personal knowledge of the facts in this declaration.

2. Exhibit 1011 is a true and correct copy of “Microstructural Changes in $\text{LiNi}_{0.8}\text{Co}_{0.15}\text{Al}_{0.05}\text{O}_2$ Positive Electrode Material During the First Cycle,” by Shijian Zheng et al., published in the Journal of the Electrochemical Society.

3. Exhibit 1012 is a true and correct copy of “Recent developments in cathode materials for lithium ion batteries,” by Jeffrey W. Fergus, published in the Journal of Power Sources.

4. Exhibit 1013 is a true and correct copy of “Various aspects of LiNiO_2 Chemistry: A Review,” by P. Kalyani et al., published in the Science and Technology of Advanced Materials.

5. Exhibit 1014 is a true and correct copy of “Percolation Models of Grain Boundary Wetting in Polycrystalline Materials,” by P. M. Volovich et al., published in the Russian Journal of General Chemistry.

6. Exhibit 1015 is true and correct copy of “Lithium Batteries and Cathode Materials,” by M. Stanley Whittingham, published in the Chemical Reviews by the American Chemical Society.

7. Exhibit 1016 is a true and correct copy of “A Review of Lithium-Ion Battery Fire Suppression,” by Mohammadmahdi Ghiji et al., published in Energies, MDPI, <http://doi.org/10.3390/en13195117>.

8. Exhibit 1017 is a true and correct copy of “Capacity-Fading Mechanisms of LiNiO_2 -Based Lithium Ion Batteries,” by Shunsuke Muto et al., published in the Journal of the Electrochemical Society.

9. Exhibit 1018 is a true and correct copy of “Comparison of structure and electrochemistry of Al- and Fe-doped $\text{LiNi}_{1/3}\text{Co}_{1/3}\text{Mn}_{1/3}\text{O}_2$,” by Daotan Liu et al., published in *Electrochimica Acta*.

10. Exhibit 1019 is a true and correct copy of “Positive Electrode Materials for Li-Ion and Li-Batteries,” by Brian L. Ellis et al., published in the *Chemistry of Materials Review*.

11. Exhibit 1020 is a true and correct copy of “Surface Analysis: X-ray Photoelectron Spectroscopy, Auger Electron Spectroscopy and Secondary Ion Mass Spectrometry,” by Noel H. Turner et al., published in the *Analytical Chemistry* by the American Chemical Society.

I hereby declare, under penalty of perjury, that all statements made in this Declaration based on my own knowledge are true, and that all statements made based on information and belief are believed by me to be true. I understand that willful false statements and the like are punishable by fine, imprisonment, or both (18 U.S.C. § 1001).

Date: July 26, 2024 /s/ Michael A. Oblon
Michael A. Oblon