

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THERMALTAKE TECHNOLOGY CO., LTD. and
THERMALTAKE INC. (a.k.a. THERMALTAKE USA)
Petitioners,

v.

LIAN LI INDUSTRIAL CO., LTD., and CHEN, CHIEN-HAO,
Patent Owners.

IPR2024-01230
U.S. Patent No. 10,690,336

**DECLARATION OF KYLE D. CHEN IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to 37 C.F.R. § 1.68, I, Kyle D. Chen, attest to the following:

1. I am a shareholder of Greenberg Traurig, LLP and am a member in good standing of the bar of California, several U.S. District Courts, the U.S. Court of Appeals for the Federal Circuit, and the Supreme Court of the United States.

2. I have not been suspended or disbarred by any court or administrative body.

3. I have never had an application for admission to 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 Title 37, Code of Federal Regulations.

6. I will be subject to the USPTO Code of Professional Responsibility 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 have applied for admission *pro hac vice* in *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00144, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00146, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00334, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*,

No. IPR2019-00337, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00338, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00522, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00523, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00524, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2021-01195, and *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2021-01196. I have not applied to appear *pro hac vice* in any other proceedings before the Office in the last three (3) years.

8. I am counsel for Patent Owner in *Lian Li Industrial Co., Ltd. and Chen, Chien-Hao v. Thermaltake Technology Co., Ltd. and Thermaltake Inc. (a.k.a. Thermaltake USA)*, Case No. 2:23-cv-07470-MAR (C.D. Cal.), filed on September 8, 2023, and *Lian Li Industrial Co., Ltd. and Chen, Chien-Hao v. Phanteks Europe and Axpertec Inc. (a.k.a. Phanteks USA)*, Case No. 2:23-cv-07471 (C.D. Cal.), filed on September 8, 2023, wherein U.S. Patent No. 10,690,336 (the "'336 patent") is currently being asserted.

9. I am an experienced litigation attorney who has been involved in numerous patent infringement cases in federal courts across the country. I have almost twenty (20) years of patent litigation experience. I have experience in various aspects of patent infringement matters, including all aspects of litigation leading up to and including trials. I have obtained substantial familiarity with the '336 patent, the prior art, and the various issues raised in this proceeding. I was involved in the

preparation of the Preliminary Response, am familiar with the subject matter involved in this proceeding, and have reviewed all documents related to this matter.

10. 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.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct. Executed this 8th day of April 2025, in Osaka, Japan.

/s/ Kyle D. Chen

Kyle D. Chen, Esq.