

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HOME DEPOT U.S.A., INC.,
Petitioner,

v.

RAVENWHITE SECURITY, INC.,
Patent Owner

Inter Partes Review No.: IPR2024-01316
Patent No. 10,594,823

**DECLARATION OF ISHMAEL W. SAFRAZ IN SUPPORT OF
PETITIONER'S NOTICE OF INTENT TO DESIGNATE ISHMAEL W.
SAFRAZ AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY
ELIGIBLE FOR AUTOMATIC PRO HAC VICE ADMISSION AS BACK-
UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10**

I, Safraz W. Ishmael, declare as follows:

1. I am a partner at DLA Piper LLP (US). As described in greater detail below, I satisfy all requirements set forth by the Board for pro hac vice recognition of a provisionally recognized PTAB attorney.

2. I have a bachelor's degree in computer science and years of computer programming experience. I am a technically trained, experienced patent litigation attorney. I have experience in numerous patent infringement litigation matters in the federal court system. I have experience in trials and *Markman* hearings. I have gained experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on infringement and validity issues, preparing for depositions of technical experts and fact witnesses, briefing claim construction issues, preparing for Markman hearings, drafting dispositive motions on a range of technical issues, and representing clients in patent litigation trials and hearings before district courts around the country. Further, I have assisted my colleagues at DLA Piper in proceedings before the Board, and I am familiar with its established practices.

3. I am a member in good standing of the Commonwealth of Massachusetts, the United States District Courts for the District of Massachusetts, the Eastern District of Texas, and the Western District of Wisconsin, and the United States Court of Appeals for the First Circuit and the for the Federal Circuit.

4. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrative body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

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. I acknowledge and agree that 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).

6. I have previously applied for pro hac vice admission before the Office, and have previously been recognized pro hac vice in a Board proceeding in at least the following IPR proceedings: IPR2020-00270, IPR2020-00245, IPR2020-00220, and IPR2020-00221. I have also not been subsequently denied permission to appear pro hac vice in a Board proceeding.

7. I have represented Home Depot U.S.A., Inc. ("Home Depot") as a client in the co-pending litigation in which U.S. Patent No. 10,594,823 is asserted against Home Depot. I have an established familiarity with the subject matter at issue in this proceeding. I have supported the work of principal attorneys responsible for the representation of Home Depot in this proceeding. I am heavily involved with the review of prior art references and the development of invalidity

positions, some of which are relied on in the petition requesting *inter partes* review of U.S. Patent No. 10,594,823.

8. 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 these statements are 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.

9. I executed this declaration on January 13, 2025, in Boston, Massachusetts.

Date: January 13, 2025

/ Safraz W. Ishmael /
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