

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEGRATED DNA TECHNOLOGIES, INC.,
Petitioner,

v.

TECAN GENOMICS, INC.,
Patent Owner.

IPR2025-00016

U.S. Patent No. 10,876,108

DECLARATION OF LINNEA P. CIPRIANO

1. I am a partner at Goodwin Procter LLP and a licensed practitioner before this tribunal. I serve as lead counsel for Tecan Genomics, Inc., in these IPR proceedings as well as related proceedings.

2. On September 19, 2025, the Board ordered that Tecan submit for *in camera* review all correspondence related to this proceeding since July 22, 2025, between (1) Tecan and Dr. Matz; (2) Tecan and Dr. Meyer; and (3) Dr. Meyer and Dr. Matz. The Board also ordered that Tecan submit a signed declaration under oath that all known correspondence has been submitted as required under the Order.

3. I confirm that Tecan conducted a reasonable search and investigation for responsive correspondence and that all correspondence identified through that investigation have been submitted as required by the Order. Tecan makes this submission without waiving its prior opposition or its right to object to, challenge, or seek review of the discovery ordered, particularly in light of the lack of any relationship between Petitioner and Dr. Meyer. Tecan makes no waiver of any confidentiality, privilege, or other applicable protections on these documents.

4. For the first two categories of correspondence, counsel for Tecan reviewed their email correspondence, meeting calendars, and phone records to identify all correspondence that Tecan had with either Dr. Matz or Dr. Meyer, and all such communications are reflected in Tecan's *in camera* submission. For the third category of correspondence, Tecan's response is based on Dr. Meyer's

representations to counsel for Tecan regarding any communications between Dr. Matz and Dr. Meyer since July 22, 2025.

5. With this declaration, Tecan is filing the requested privileged correspondence, including copies of email chains and a declaration from Timothy Beavers providing a timeline of correspondence, including privileged information and descriptions of the correspondence. These exhibits reflect privileged communications and are being filed under seal for *in camera* review.

6. I further confirm that neither Tecan nor its counsel received any confidential information or litigation strategy of Petitioner that may have previously been provided to Dr. Matz by IDT and/or Williams & Connolly LLP.

7. Tecan is unaware of any instance in which Dr. Meyer could have received confidential information from Petitioner.

8. In signing this declaration, I affirm under the penalty of perjury that the information set forth herein is true and correct to the best of my knowledge.

Date: September 26, 2025

/Linnea P. Cipriano/
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*Lead Counsel for Patent Owner Tecan
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S UPDATED EXHIBIT LIST** was served on September 26, 2025 via email to Petitioner by serving the correspondence addresses of record as follows:

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September 26, 2025

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