UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Axle & Manufacturing, Inc.,
Petitioner,

v.

Neapco Components, LLC,
Patent Owner.

Case IPR2025-00090
U.S. Patent No. 11,434,958

DECLARATION OF DAVID J. THOMAS IN OPPOSITION TO PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 11,434,958

---

1. My name is David J. Thomas, and I am over the age of majority and competent to make this declaration based on my personal and professional knowledge. I am a partner at Honigman LLP. I am making this declaration in support of Neapco Components, LLC's response in Opposition to Petitioner's, American Axle & Manufacturing, Inc.'s, Petition for Inter Partes Review of U.S. Patent No. 11,434,958.

2. I accessed the webpages shown in Exhibit 2001 and 2002 on February 4, 2025. The exhibits are true and accurate copies of the webpages.

3. I hereby declare that all statements made herein of my own knowledge are true and all statements made on information and belief are believed to be true; and further that these statements were made with knowledge that with false statement and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Respectfully submitted,

/David J. Thomas/
David J. Thomas

Dated: March 11, 2025