

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,
Petitioners

v.

ZAXCOM, INC.,
Patent Owner

IPR2025-00230

U.S. Patent No. 7,711,443

DECLARATION OF NICHOLAS SENECKZO

DECLARATION

I, Nicholas Seneczko, under penalty of perjury, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts below and, if called upon to testify, can and would testify competently thereto. I am an associate attorney at the law firm, Chipperson Law Group, P.C., and I am licensed to practice law in Indiana. I am also admitted to the United States Patent and Trademark Office. I make this declaration in support of Zaxcom Inc.'s Motion for Sanctions and Vacatur of Institution/Termination.

2. On November 21, 2025, I accessed a website titled "The Freedman Group Partners With Audinate To Bring Dante Technology to RODE Mackie" located at the following URL: <https://www.audinate.com/press/the-freedman-group-partners-with-audinate-to-bring-dante-technology-to-rode-mackie/>.

3. As of the date I accessed the webpage, November 21, 2025, the website was publicly accessible without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the website free of charge. The website was publicly accessible to me without any login requirements, paywalls, or restrictions.

4. On November 21, 2025, I screenshotted, or caused to be screenshotted, the website using the tool "GoFullPage" on my computer. This screenshot was saved as Exhibit 2162. The screenshot file accurately reproduces the content of the

website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

5. On November 21, 2025, I accessed a website titled “Lectrosonics Announces Firmware Updates For Select Transmitters To Record & Transmit Simultaneously For Markets Outside the United States” located at the following URL:

<https://lectrosonics.com/lectrosonics-announces-firmware-updates-for-select-transmitters-to-record-transmit-simultaneously-for-markets-outside-of-the-united-states/>.

6. As of the date I accessed the webpage, November 21, 2025, the website was publicly accessible without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the website free of charge. The website was publicly accessible to me without any login requirements, paywalls, or restrictions.

7. On November 21, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2163. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

8. On November 23, 2025, I accessed a website titled “The Freedman Group Acquires Lectrosonics, World Leaders in UHF Wireless Audio” located at the

following URL: <https://lectrosonics.com/the-freedman-group-acquires-lectrosonics-world-leaders-in-uhf-wireless-audio/>.

9. As of the date I accessed the webpage, November 23, 2025, the website was publicly accessible without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the website free of charge. The website was publicly accessible to me without any login requirements, paywalls, or restrictions.

10. On November 23, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2174. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

11. On November 23, 2025, I accessed a website titled “‘It’s going to scare the shit out of everybody’: Peter Freedman buys US rival Lectrosonics” located at the following URL: <https://www.forbes.com.au/covers/billionaires/peter-freedman-of-rode-buys-us-rival-lectrosonics/>.

12. As of the date I accessed the webpage, November 23, 2025, the website was publicly accessible without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the

website free of charge. The website was publicly accessible to me without any login requirements, paywalls, or restrictions.

13. On November 23, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2177. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

14. On November 9, 2025, I accessed a website titled “Firmware: SMWB & SMDWB” located at the following URL: <https://lectrosonics.com/firmware-smwb-smdwb/>.

15. As of the date I accessed the webpage, November 9, 2025, the website was publicly accessible without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the website free of charge. The website was publicly accessible to me without any login requirements, paywalls, or restrictions.

16. On November 9, 2025, I downloaded, or caused to be downloaded, the website. This screenshot was saved as Exhibit 2179. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

17. On November 24, 2025, I accessed a LinkedIn page for Daniel Woodall located at the following URL:

<https://www.linkedin.com/in/danwoodall/?originalSubdomain=au>.

18. As of the date I accessed the webpage, November 24, 2025, the website required a user account to access. The website required me to login with my login requirements before accessing the LinkedIn page.

19. On November 24, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2181. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

20. On November 24, 2025, I accessed a LinkedIn page for Christopher Lee located at the following URL: <https://www.linkedin.com/in/chris-lee1/?originalSubdomain=au>.

21. As of the date I accessed the webpage, November 24, 2025, the website required a user account to access. The website required me to login with my login requirements before accessing the LinkedIn page.

22. On November 24, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2182. The screenshot file accurately reproduces the content of the

website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

23. On November 24, 2025, I accessed a LinkedIn page for Stuart Kipreotis located at the following URL:

<https://www.linkedin.com/in/stuartkipreotis/?originalSubdomain=au>.

24. As of the date I accessed the webpage, November 24, 2025, the website required a user account to access. The website required me to login with my login requirements before accessing the LinkedIn page.

25. On November 24, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2183. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

26. On November 24, 2025, I accessed a LinkedIn page for Richard Johnstone located at the following URL: <https://www.linkedin.com/in/richard-johnstone-0a1756204/>.

27. As of the date I accessed the webpage, November 24, 2025, the website required a user account to access. The website required me to login with my login requirements before accessing the LinkedIn page.

28. On November 24, 2025, I screenshotted, or caused to be screenshotted, the website using the tool “GoFullPage” on my computer. This screenshot was saved as Exhibit 2184. The screenshot file accurately reproduces the content of the website as it appeared when I accessed it. I did not alter, edit, enhance, compress, or modify the website in any way.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on the 28th day of November, 2025 in Arlington Heights, Illinois.

A handwritten signature in black ink, appearing to read 'Nicholas Seneczko', is written over a horizontal line.

Nicholas Seneczko