

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 BRANDON CAPRIONI

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I, Brandon Caprioni, under penalty of perjury, declare as follows:

1. I am over the age of 18.
2. I am a paralegal at the law firm, Chipperson Law Group, P.C. My responsibilities include assisting with technical evidence collection, online research, and electronic file preservation. I have personal knowledge of the facts set forth in this declaration and, if called to testify, could and would testify competently thereto.
3. I make this declaration in support of Zaxcom, Inc.'s MOTION FOR SANCTIONS AND VACATUR OF INSTITUTION/TERMINATION.
4. On November 28, 2025, I accessed a YouTube video titled "Lectrosonics + Rode: Ask Us Anything" located at the following URL:
https://www.youtube.com/watch?v=POs0_LByYN4. The video displayed on that page was titled "Lectrosonics + Rode: Ask Us Anything" and was posted by the YouTube channel "Gotham Sound."
5. As of the date I accessed the webpage, November 28, 2025, the video was publicly accessible on YouTube without requiring a password, user account, subscription, or any form of restricted access. Anyone with an internet connection could view the video free of charge. The video was publicly accessible to me on YouTube on that date without any login requirements, paywalls, or restrictions.

6. The YouTube page displayed a public upload date of "June 28, 2025."
7. On November 28, 2025, I screen-recorded the video from YouTube using the software tool "Clipchamp" on my work computer.
8. "Clipchamp" has a 30-minute time limit for screen recordings. At the 4-minute mark of part C, there is a brief cut where I paused the video, reset the screen recording, and resumed the video at the moment it previously left off.
9. To meet PTACT file size requirements, I split the screen-recording into three separate parts and compressed the video quality using the software "HandBrake."
10. The screen-recording file was saved as "Ex-2164 Lectrosonics + Rode Ask Us Anything A.mp4," "Ex-2164 Lectrosonics + Rode Ask Us Anything B.mp4," and "Ex-2164 Lectrosonics + Rode Ask Us Anything C.mp4."
11. The screen-recorded video files accurately reproduce the content of the video as it appeared on YouTube when I accessed it. I did not modify the video content in any way.
12. Based on my review, the video had 794 views as of the date I accessed it, indicating public accessibility.
13. I maintained the file in a secure evidence directory without modification from the time it was downloaded until submission as Exhibit 2164 A, B, and C.

14.Exhibits 2164 A, B, and C and exhibits 2190 A, B, and C are true and accurate copies of the YouTube video and its file metadata as they appeared when I accessed it on November 28, 2025.

15.The videos attached as Exhibit 2164 A, B, and C show what I personally observed. It accurately depicts the content contained in the video and the surrounding webpage elements.

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 Mendham, New Jersey.

A handwritten signature in black ink, reading "Brandon Caprioni", written over a horizontal line.

Brandon Caprioni