

IPR2025-00231
Patent 7,929,902

**UNITED STATES PATENT AND TRADEMARK
OFFICE**

**BEFORE THE PATENT TRIAL AND APPEAL
BOARD**

**RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,**
Petitioner,

v.

ZAXCOM, INC.,
Patent Owner.

Case IPR2025-00231

Patent 7,929,902

DECLARATION OF PIETER SCHILLEBEECKX

I, Pieter Schillebeeckx, declare as follows:

1. I am of over the age of eighteen, and am competent to make this declaration on behalf of Petitioners, Freedman Electronics Pty Ltd. ("Freedman") and RØDE Microphones, LLC ("RØDE") (together, "Petitioners"). I reside in Marlow, England. I provide this declaration based upon my personal knowledge.

2. I am Technology Director of Freedman, a corporation organized under Australian law, located at 107 Carnarvon Street Silverwater, NSW 2128 Australia. I joined Freedman in 2016.

3. As Technology Director, I have been involved in efforts to collaborate with third-party companies to jointly develop new RØDE-branded microphones and other audio products. In June 2024, Freedman became interested in exploring the possibility of a technical collaboration with Lectrosonics, Inc. ("Lectrosonics"), involving [REDACTED] I understand that the Petitioners have produced the early introductory emails between me, Freedman's CEO Damien Wilson, and Lectrosonics Executive Vice President for Product Design & Distribution Karl Winkler. Ex. 2030.

4. After receiving Mr. Wilson's approval, I reached out by telephone to Mr. Winkler to introduce myself and raise the subject of the possible product development joint project. During the call, Mr. Winkler told me that he was aware from public sources that Zaxcom had sued Petitioners for patent infringement, and asked me some general questions about the status of the case. I told him I was not knowledgeable enough about the litigation to answer, but I told him that I would put him in touch with Mr. Wilson. Mr. Winkler did not mention patent office proceedings, inter partes review or "IPRs." On June 19, 2024, I emailed Mr. Winkler and Mr. Wilson to introduce them to each other. Ex. 2030 at IPR2025-00231-0000836. In my email, I mentioned to Mr. Winkler that "you were asking some questions with regards Zaxcom which I couldn't answer" and said that Mr. Wilson was eager to connect. Mr. Winkler and Mr. Wilson exchanged emails (on which I was copied) to set up a call but I am not aware that such a call ever happened. I personally never communicated again, orally or in writing, with Mr. Winkler or anyone else at Lectrosonics about Zaxcom, including about the current pending lawsuit against Freedman and RØDE, the related U.S. patent office inter partes review proceedings, or Zaxcom's prior litigation and patent office proceedings

involving Lectrosonics. Nor am I aware of anyone else at Freedman or RØDE having such communications with Lectrosonics.

I declare under penalty of perjury under the laws of the United States of America and the United Kingdom that the foregoing is true and correct.

Dated:



Pieter Schillebeeckx