UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

EYESMATCH LTD.,
Patent Owner

Case No. IPR2025-00297
U.S. Patent No. 8,982,109

DECLARATION OF WILLIAM P. NELSON IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION

I, WILLIAM P. NELSON, declare as follows:

1. I am a member in good standing of the State Bar of California as well as the bars of the United States Court of Appeals for the Federal Circuit and the United States Supreme Court. I am also admitted to practice in the following United States District Courts: the Northern, Southern, and Central Districts of California; the Eastern and Western Districts of Texas.

2. I have not been suspended or disbarred from practice before any court or administrative body.

3. I have never had an application for admission to practice before any court or administrative body denied.

4. No sanction or contempt citation has been imposed against me by any court or administrative body.

5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in Part 42 of 37 C.F.R.

6. I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I have applied to appear pro hac vice before the Office in Proceeding Nos. IPR2022-00370, IPR2022-00371, IPR2022-00489, IPR2022-00490, IPR2020-

00715, IPR2020-00712, IPR2020-00680, IPR2020-00679, IPR2024-00810, and IPR2024-00856 in the last three years. All motions were either granted or, in the case of IPR2022-00489, IPR2022-00490, IPR2022-00370, and IPR2022-00371, not decided. In IPR2022-00489, IPR2022-00490, IPR2022-00370, and IPR2022-00371, the proceedings were never instituted and instead were terminated following a joint motion to terminate by the parties. I am also concurrently applying to appear *pro hac vice* in Proceeding No. IPR2025-00296.

8. I am an experienced litigation attorney with approximately twenty years of experience representing clients in patent cases involving a variety of technologies. I litigate patent cases in U.S. District Courts, the International Trade Commission, and the United States Court of Appeals for the Federal Circuit. Through my experience in patent litigation matters, I have represented clients in all phases of litigation including fact discovery, expert discovery, *Markman* hearings, jury trials, bench trials, trials before administrative law judges, and appeals before the United States Court of Appeals for the Federal Circuit. Prior to joining Tensegrity, I was a partner at Hosie Rice LLP. My biography is attached hereto as Exhibit A.

9. I have an established familiarity with the subject matter at issue in this proceeding. I am trial counsel for EyesMatch Ltd., the Patent Owner in this

proceeding, in the U.S. District Court for the Eastern District of Texas, Case No. 2:23-cv-00363-JSG-RSP, which involves the same patent (U.S. Patent No. 8,982,109) and the same references identified in the Petition in this proceeding as the grounds for challenge. I have reviewed and am familiar with U.S. Patent No. 8,982,109 at issue in this proceeding, the Petition and supporting exhibits in this proceeding, the art presented in the Petition, and the legal and factual issues raised in this proceeding. As a result, I have a substantial understanding of the underlying legal and technological issues at stake in this proceeding.

10. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: January 21, 2025 Respectfully submitted.

/William P. Nelson/
William P. Nelson

EXHIBIT A

tensegrity LAW GROUP LLP

- Attorneys
  - Matthew Powers
  - Paul Ehrlich
  - Azra Hadzimehmedovic
  - William Nelson
  - Aaron Nathan
  - Stefani Smith
  - Robert Gerrity
  - Samantha Jameson
  - Ron Pabis
  - Natasha Saputo
  - Danielle Pfifferling
  - Daniel Radke
  - Li Shen
  - Kiley White
  - Jerome Ma
  - Joanna R. Schacter
  - Nate Cook
  - John Pierce

Email: William.Nelson
Phone: 650-802-6075

555 Twin Dolphin Drive
Suite 650
Redwood Shores, CA 94065

William Nelson

Partner

William Nelson has extensive experience representing industry-leading high technology clients in patent, antitrust, copyright, licensing, and trade secret protection disputes, in U.S. district court, at the ITC, and in arbitration. He has litigated high-stakes patent disputes in matters relating to computers; mobile phones; enterprise software; search engine technologies; semiconductor devices; networking; mobile commerce; computer vision; and other technologies. Prior to joining Tensegrity Law Group LLP in 2012, Mr. Nelson was a partner at Hosie Rice LLP.

In 2018, Mr. Nelson received his 4th consecutive selection to Super Lawyers.

ADMISSIONS AND QUALIFICATIONS

1998, California

California Supreme Court

United States Court of Appeals for the Federal Circuit

United States District Court for the Northern District of California

United States District Court for the Southern District of California

United States District Court for the Eastern District of Texas

United States District Court for the Western District of Texas

EDUCATION

Berkeley Law, J.D. (1992)

UC Riverside, B.A., Public Policy (1989)

SILICON VALLEY OFFICE

555 TWIN DOLPHIN DRIVE,
STE 650
REDWOOD SHORES, CA
94065
P: (650) 802-6000
F: (650) 802-6001

WASHINGTON, D.C. METRO OFFICE

1676 INTERNATIONAL DRIVE,
STE 910
MCLEAN, VA 22102
P: (571) 545-7880

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