

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

POSCO CO. LTD.,
Petitioner,

v.

ARCELORMITTAL,
Patent Owner.

Case No. IPR2025-00371
U.S. Patent No. 11,326,227

**DECLARATION OF RAYMOND LAMAGNA IN SUPPORT OF
PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
RAYMOND LAMAGNA UNDER 37 C.F.R. § 42.10(c)**

I, Raymond LaMagna, being over 18 years of age and competent to testify and make this declaration based upon my personal knowledge, and being duly sworn and upon oath, hereby attest to the following:

1. I am an attorney at Gibson, Dunn & Crutcher LLP.
2. I have been an attorney specializing in patent litigation for nearly 19 years. As such, I have been litigating patent-related cases during the majority of that time period, including before the International Trade Commission, Patent Trial and Appeal Board, the Court of Appeals for the Federal Circuit, and multiple United States District Courts. I have experience in multiple aspects of patent infringement and invalidity matters, jury and bench trials, Markman hearings, and summary judgment hearings.
3. I am a member in good standing of the State Bar of California (2006). I am admitted to practice before the United States Courts of Appeals for the Federal Circuit and Ninth Circuit and the United States District Courts for the Eastern District of Texas, Southern, Central, and Northern Districts of California, and the Northern District of Illinois. I have been admitted pro hac vice in other District Courts, including for the District of Delaware, Southern District of New York, Eastern District of Virginia. I have never been suspended or disbarred from practice before any court or administrative body. Nor have any sanctions or

contempt citations have ever been imposed against me by any court or administrative body.

4. 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.

5. I understand and agree that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101, *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

6. Within the past 3 years, I was admitted to practice *pro hac vice* and was active in this jurisdiction in the matters of IPR2022-00062, IPR2022-00063, and IPR2022-00064 (collectively *Samsung Electronics Co Ltd et al. v. Netlist Inc.*).

7. I am familiar with the subject matter at issue in this proceeding. I began representing and advising the Patent Owner in matters relating to U.S. Patent No. 11,326,227 since at least 2024. I have reviewed the papers filed in this proceeding. Since 2024, I have served as counsel for ArcelorMittal in *Certain High-Strength Aluminum or Aluminum Alloy-Coated Steel, and Automotive Products and Automobiles Containing Same*, Inv. No. 337-TA-1402 before the International Trade Commission, as well as counsel for ArcelorMittal in *ArcelorMittal v. VinFast Auto, LLC et al.*, Case No. 2:24-cv-3128, in the United States District Court for the Central District of California, which both involved the '227 patent under review in this proceeding. During this time, I have become

familiar with the '227 patent, its prosecution file history, and the prior art and other papers cited in the Petition.

I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and 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: October 8, 2025

By: /Raymond LaMagna/
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