

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FULL-METAL-POWER B.V.,
Petitioner,

v.

INFOCUS DOWNHOLE SOLUTIONS USA LLC,
Patent Owner.

Case IPR2025-00391
Patent No. 10,676,992

**DECLARATION OF ARCHIBALD DELEON CRUZ IN SUPPORT OF
PATENT OWNER INFOCUS DOWNHOLE SOLUTIONS USA LLC'S
MOTION FOR PRO HAC VICE ADMISSION OF
ARCHIBALD DELEON CRUZ
UNDER 37 C.F.R. § 42.10(c)**

I, Archibald Deleon Cruz, declare as follows:

1. I am an attorney licensed to practice law in the State of Texas.
2. I am a member in good standing in all jurisdictions where I have been admitted to practice.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application denied for admission to practice before any court or administrative body.
5. I have never had any sanctions or contempt citations imposed upon me by any court or administrative body.
6. 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.
7. I agree to be subject to the U.S.P.T.O. 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).
8. I am an associate at the law firm of Patterson + Sheridan, L.L.P.
9. I have practiced law in Texas since 2023, and the majority of my practice has consisted of patent litigation and other patent related matters. Representative patent litigations where I have been actively involved as patent litigation counsel include:

- *Pave/Lock/Plus II LLC v. Erosion Prevention Products LLC*, 4:20-cv-03557 (S.D. Tex.);
- *Cobblestone Wireless, LLC v. Cisco Systems, Inc.*, 2:23-cv-00454 (E.D. Tex.);
- *Charge Fusion Technologies, LLC v. Polestar Automotive USA, Inc.*, 1:22-cv-01379 (D. Del);
- *CloudfChange, LLC v. Lightspeed POS Inc.*, 6:21-cv-01102 (W.D. Tex.); and
- *InFocus Downhole Solutions USA LLC v. Full-Metal-Power B.V.*, 2:24-cv-00875 (E.D. Tex.).

10. My experience in post-grant patent proceedings includes drafting a petition, a mandatory notice, and a reply. I am actively involved in the following matter:

- *Qualcomm Incorporated v. Cobblestone Wireless, LLC* (IPR2024-01336).

11. Other than the matters identified in ¶¶ 9-10 *supra*, I have not applied to appear *pro hac vice* in any other proceedings before the U.S.P.T.O. in the last three years.

12. I have an established familiarity with the subject matter at issue in this proceeding. I have reviewed the Patent at issue, the Petition, and the relevant art.

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 are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Date: February 19, 2025


Archibald Deleon Cruz