

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

BRODTI INC.,
Patent Owner.

Case IPR2025-00472
Patent 11,416,898 B2

**DECLARATION OF REUBEN CHEN
PURSUANT TO 37 CFR § 42.10(c)(2)**

I, Reuben Chen, declare as follows:

1. I am a member in good standing of the Bar of California.
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 37 C.F.R. part 42.
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* in the following docket numbers:
 - IPR2015-00740
 - IPR2015-01401
 - IPR2016-00160
 - IPR2016-00162
 - IPR2016-00163
 - IPR2016-00166
 - IPR2016-00169
 - IPR2016-00170
 - IPR2016-00171
 - IPR2016-00187
 - IPR2016-00315
 - IPR2016-00317

IPR2016-00341
IPR2016-00380
IPR2016-00476
IPR2016-00547
IPR2016-00717
IPR2018-00200
IPR2018-00312
IPR2018-00369
IPR2016-00397
IPR2018-00404
IPR2018-00408
IPR2018-00416
IPR2018-00439
IPR2019-00144
IPR2019-00334
IPR2019-00337
IPR2019-00338
IPR2019-00655
IPR2019-00705
IPR2019-00709
IPR2020-00747
IPR2020-00819
IPR2020-00820
IPR2020-00825
IPR2023-00427
IPR2023-00433
IPR2024-00752
IPR2024-00753

I am not aware of having applied to appear *pro hac vice* before the Office in any other proceeding in the last three (3) years.

8. I am an experienced litigation attorney with experience with complex litigation in both state and federal courts. I am familiar with the subject matter at issue in this proceeding, including the prior art on which Petitioner relies in this

request and U.S. Patent No. 11,416,898 B2. I have also reviewed the pertinent issues of claim construction that have been briefed in this proceeding.

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements are 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 18 U.S.C. § 1001.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 18th day of September 2025, in Palo Alto, California.

/Reuben Chen/

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