IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

GOOGLE LLC,

Petitioner,

v.

BRODTI INC.,

Patent Owner.

_____

Case No. IPR2025-00472

U.S. Patent No. 11,416,898

_____

DECLARATION OF TIMOTHY CREMEN IN SUPPORT OF PATENT OWNER RESPONSE

I, Timothy Cremen, declare as follows:

1. I am an attorney at the law firm of Sheppard, Mullin, Richter & Hampton LLP and lead counsel for Patent Owner in this matter.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office ("USPTO"). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 2005 is a true and correct copy of Plaintiff's Response To Defendant's Motion To Dismiss in BrodTi Inc., v. Google LLC, C.A. No. 24-173-JCB (D. Del.). This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Exhibit 2007 is a true and correct copy of the specified dictionary definitions as obtained from The New Oxford American Dictionary by the Oxford University Press, 2001, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Exhibit 2008 is a true and correct copy of the specified dictionary definitions as obtained from Webster's Third New International Dictionary,

Merriam-Webster, Inc., 2002, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

/s/Timothy P. Cremen
Timothy P. Cremen