

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Stanley Black & Decker, Inc.
Petitioner

v.

Viking Arm AS
Patent Owner

IPR2025-00665
U.S. Patent No. 11,554,473

DECLARATION OF BENJAMIN L. KIERSZ

I, Benjamin L. Kiersz of Falls Church, Virginia, declare as follows:

1. I am an attorney at the law firm Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), and counsel for Petitioner Stanley Black & Decker, Inc.
2. Petitioner’s Exhibits 1001, 1005, and 1006, filed herewith, are true and accurate copies of these documents, which were obtained from the USPTO’s online records (Patent Center, Patent Public Search, etc.).
3. Petitioner’s Exhibit No. 1003 is a true and accurate copy of German Patent Specification Pub. No. DE 101 27 718 A1, as obtained from the European Patent Office’s online records (Espacenet).
4. Petitioner’s Exhibit No. 1007 is a true and accurate copy of a document titled “Volkswagon 1200 Instruction Manual Sedan and Convertible August 1964,” which was downloaded from the website,
https://web.archive.org/web/20161215232438/http://www.thesamba.com/vw/archives/manuals/8_64bug/1965_Beetle_Owners_Manual.pdf, on February 27, 2025. Petitioner’s Exhibit No. 1009 is a true and accurate copy of an Internet Archive webpage
(https://web.archive.org/web/20161215232438/http://www.thesamba.com/vw/archives/manuals/8_64bug/1965_Beetle_Owners_Manual.pdf) from which Petitioner’s Exhibit No. 1007 was downloaded. Petitioner’s Exhibit No. 1009 also includes a true and accurate copy of the Internet Archive webpage

(https://web.archive.org/web/20161215232314/https://www.thesamba.com/vw/archives/manuals/8_64bug.php), which links to the .pdf in Petitioner's Exhibit 1007. On information and belief, as shown in Petitioner's Exhibit No. 1009, the Internet Archive archived Petitioner's Exhibit No. 1007 as of December 15, 2016.

5. Petitioner's Exhibit No. 1008 is a true and accurate copy of a document obtained from the European Patent Office's online records (European Patent Register) for European Patent No. EP3953541B1.
6. I 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.

February 28, 2025

/Benjamin L. Kiersz/

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