

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SOUNDCLEAR TECHNOLOGIES LLC,

Plaintiff,

v.

AMAZON.COM, INC.;
AMAZON.COM SERVICES LLC; and
AMAZON WEB SERVICES, INC.,

Defendants.

Case No. 1:24-cv-01283-AJT-WBP

JURY TRIAL DEMANDED

**DECLARATION OF COLIN HEIDEMAN IN SUPPORT OF DEFENDANTS’
MOTION TO STAY PENDING *INTER PARTES* REVIEW**

I, Colin B. Heideman, hereby declare as follows:

1. I am a partner in the law firm of Knobbe, Martens, Olson & Bear, LLP, counsel for Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc., (collectively “Defendants”) in this action. I have personal knowledge of the matters set forth in this declaration and, if called upon as a witness, would testify competently thereto. I submit this Declaration in support of Defendants’ Motion to Stay Pending *Inter Partes* Review.

2. On January 31, 2025, Defendants filed an *inter partes* review (“IPR”) petition before the Patent Trial and Appeal Board (“PTAB”) of the United States Patent & Trademark Office challenging the validity of all claims in asserted U.S. Patent No. 11,069,337 (“the ’337 patent”). That IPR proceeding is number IPR2025-00565. On February 27, 2025, Defendants filed an IPR petition challenging the validity of all claims in asserted U.S. Patent No. 11,244,675 (“the ’675 patent”). That IPR proceeding is number IPR-00673.

3. As of the date of this declaration, Plaintiff and Defendants have each served two sets of requests for production. Plaintiff has served three sets of interrogatories and Defendants have served two sets of interrogatories.

4. As of the date of this declaration, Plaintiff has produced 67 documents in this case. The documents relate to Plaintiff's corporate filings and the asserted patents. Amazon has not produced any documents.

5. As of the date of this declaration, Plaintiff has taken two depositions. Defendants have not taken any depositions.

6. In its most recent Initial Disclosures, Plaintiff identified 24 individuals that Plaintiff believes may have relevant discoverable information. In their Initial Disclosures, Defendants identified more than 50 individuals that may have relevant discoverable information.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2025, at Seattle, Washington.

/s/Colin B. Heideman
Colin B. Heideman