

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DATADOME S.A. AND DATADOME SOLUTIONS, INC.,

Petitioners,

v.

ARKOSE LABS HOLDINGS, INC.,

Patent Owner.

Case No. IPR2025-00694

U.S. Patent No. 9,148,427

**DECLARATION OF CHRISTIAN E. MAMMEN
PURSUANT TO 37 C.F.R. § 42.10(c)(2)**

**Arkose Labs
Holdings, Inc.
Exhibit 2001
DataDome v. Arkose
IPR2025-00694**

Ex. 2001

I, Christian E. Mammen, declare:

1. I attest to satisfying “all requirements set forth by the Board for *pro hac vice* recognition of a provisionally recognized PTAB attorney.” *See* 37 C.F.R. § 42.10(c)(2)(ii)(B).

2. I am an attorney at the law firm of Womble Bond Dickinson (US) LLP.

3. I am a member in good standing of the bars of California, Oregon and Washington.

4. I have never been suspended or disbarred from practice before any court or administrative body.

5. I have not been denied admission to practice before any court or administrative body.

6. No court or administrative body has ever imposed sanctions or contempt citations on me.

7. 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 Title 37, Code of Federal Regulations (“C.F.R.”).

8. I agree to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. I was previously admitted *pro hac vice* in the following cases before the Board: IPR2023-01256 (Paper 9), PGR2021-00102 (Paper 12), and PGR2021-00103 (Paper 14).

10. I have an established familiarity with the subject matter at issue in this proceeding. I have read and understand the pleadings submitted by Petitioners in this proceeding.

11. I have engaged in hours of strategic and substantive discussions regarding this proceeding with Preston H. Heard, who is the lead counsel for Patent Owner in this proceeding.

12. Through my more than 25 years of patent litigation experience, I am very familiar with the legal theories advanced in this case.

13. I have reviewed in detail the patent challenged in this proceeding. I have also reviewed Exhibits submitted by Petitioner in this proceeding. I am also counsel of record in litigation involving the '427 patent before the United States District Court of the District of Delaware (*Arkose Labs Holdings, Inc. et al v. DataDome et al*, C.A. No. 1-23-cv-01467).

14. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made on information and belief are believed to be true. I understand that willful

false statements are punishable by fine or imprisonment, or both. *See* 18 U.S.C. § 1001.

Date: April 23, 2025

Respectfully submitted,

/Christian E. Mammen/
Christian E. Mammen