

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUZHOU MOJAWA INTELLIGENT ELECTRONIC CO., LTD.,
Petitioner

v.

SHENZHEN SHOKZ CO., LTD.,
Patent Owner

Inter Partes Review No.: IPR2025-00842
U.S. Patent No. 11,197,084

**DECLARATION OF BENJAMIN MUELLER IN SUPPORT OF
PETITIONER'S NOTICE OF INTENT TO DESIGNATE BENJAMIN
MUELLER AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY
ELIGIBLE FOR AUTOMATIC *PRO HAC VICE* ADMISSION AS BACK-
UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10**

I, Benjamin Mueller, declare as follows:

1. I am an associate at DLA Piper LLP (US). As described in greater detail below, I satisfy all requirements set forth by the Board for *pro hac vice* recognition of a provisionally recognized PTAB attorney.

2. I am an experienced litigation attorney with an established familiarity with the patent involved in this IPR by way of being counsel of record in co-pending litigation involving Patent No. 11,197,084 (“the ’084 patent”), *Shenzhen Shokz Co., Ltd. v. Shenzhen Wenming Technology Co., Ltd. et al*, Case No. 1-24-cv-06717 (N.D. Ill.). As part of that litigation, I have familiarized myself with the ’084 patent, its file history, the underlying technology, and the prior art references involved in these proceedings.

I have assisted my colleagues at DLA Piper in proceedings before the Board, and I am familiar with its established practices. I have argued before PTAB judges in IPR proceedings. Further, I have experience in numerous patent infringement litigation matters in the federal court system. I have experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on validity issues, preparing for depositions of technical experts and fact witnesses, briefing claim construction issues, and drafting motions.

3. I am a member in good standing of the State Bar of Illinois, the United States District Court for the Northern District of Illinois, and the United States Court of Appeals for the Federal Circuit.

4. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrative body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

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 part 42 of 37 C.F.R. I acknowledge and agree that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

6. I have previously applied for *pro hac vice* admission before the Office and have previously been recognized *pro hac vice* in a Board proceeding in at least the following IPR proceedings: IPR2021-01368, IPR2021-01369, IPR2021-01541, IPR2022-00023, and PGR2022-00009. I have also not been subsequently denied permission to appear *pro hac vice* in a Board proceeding.

7. I hereby 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 are made with the knowledge that willful false

statements and the like so made are punishable by fine or imprisonment, or both, under § 1001 of Title 18 of the United States Code.

9. I executed this declaration on July 25, 2025, in Chicago, IL.

Date: July 25, 2025

/s/ Benjamin Mueller

Benjamin Mueller

DLA Piper LLP (US)

444 West Lake Street, Suite 900

Chicago, IL 60606-0089

Phone: + 1 (312) 368-4000

Fax: + 1 (312) 236-7516

Email: benjamin.mueller@us.dlapiper.com