UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO. LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners

v.

VB ASSETS, LLC,

Patent Owner

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Case: IPR2025-00868
U.S. Patent No. 8,515,765

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DECLARATION OF ANDREW J. LIGOTTI IN SUPPORT OF PATENT OWNER'S NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY UNDER 37 C.F.R. § 42.10(c)(2)

I, Andrew J. Ligotti, declare as follows:

1. I am an attorney with the law firm of Alston & Bird LLP and practice in its IP Litigation group. I have been a practicing attorney since 2015.

2. I am a member in good standing of the State Bar of New York.

3. I have not been suspended or disbarred from practice before any court or administrative body.

4. I have never been denied admission to practice before any court or administrative body.

5. I have never been subject to sanctions or contempt citations imposed by any court or administrative body.

6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in title 37, part 42 of the Code of Federal Regulations (C.F.R.).

7. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Responsibility set forth in parts 10 and 11 of 37 C.F.R. and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. The most recent prior proceeding in which I sought to appear and was recognized *pro hac vice* by order of the PTAB pursuant to a motion was *Intel Corporation v. InterDigital, Inc*., IPR2024-01441 (PTAB Mar. 6, 2025). *See* Paper 9, ORDER Granting Patent Owner's Motion for Admission *Pro Hac Vice* of Andrew

J. Ligotti 37 C.F.R. § 42.10.

9. I have previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2022-00292 and IPR2022-00293. The Board granted these applications on August 11, 2022. *See* IPR2022-00292, -00293, Paper 14. I have also previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2022-00471. The Board granted this application on October 25, 2022. *See* IPR2022-00471, Paper 33. I have also previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2022-00851. The Board granted this application on November 30, 2022. *See* IPR2022-00851, Paper 15. I have also previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2022-00864. The Board granted this application on January 3, 2023. *See* IPR2022-00864, Paper 16. I have also previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2021-00339, IPR2021-00340, and IPR2021-00341. The Board granted these applications on August 9, 2023. *See* IPR2021-00339, -00340, -00341, Paper 45. As noted above, I have also previously applied to appear *pro hac vice* before the Patent Trial and Appeal Board in IPR2024-01441. The Board granted this application on March 6, 2025. *See* IPR2024-01441, Paper 9. I have not applied to appear *pro hac vice* before the Board in any other proceedings in the last three years.

10. I am an experienced intellectual property litigator. I hold a B.S.M.E.

degree from the Georgia Institute of Technology and a J.D. degree from the University of North Carolina School of Law. My experience includes significant experience litigating patents with subject matter similar to and substantially related to the subject matter of U.S. Patent No. 8,515,765, the "Challenged Patent" in this IPR. I have represented clients in numerous patent infringement lawsuits across the country involving patents in a variety of technical areas, including medical devices, pharmaceuticals, retractable roof systems, internal combustion engines, and telecommunications.

11. I have an established familiarity with the subject matter at issue in this proceeding. In addition to my general familiarity with the technologies identified in the patent, I was retained as counsel for Patent Owner in this matter and have spent significant time and resources to assist Patent Owner with respect to the challenges raised in the Petition for *Inter Partes* Review. I have reviewed the Challenged Patent in detail. I have also reviewed the Petition and accompanying exhibits, as well as the Challenged Patent's prosecution history. I have spent significant time reviewing and analyzing prior art related to the Challenged Patent, including the prior art upon which this IPR proceeding is based, and I have corresponded with subject matter experts. I have also reviewed all of the other filings associated with this IPR.

12. I further understand that I have a continuing duty to notify the Board in writing within five business days if: (i) I am sanctioned, cited for contempt,

suspended, disbarred, or denied admission by any court or administrative agency; (ii) I no longer qualify as a member in good standing of the Bar of at least one State or the District of Columbia; or (iii) any other event occurs that renders materially inaccurate or incomplete any representation that I made to the Board in connection with this request for pro hac vice recognition other than subsequent applications for pro hac vice recognition unless such an application is denied.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that all statements made herein of my own knowledge are true and that all opinions expressed herein are my own; and further that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

July 14, 2025

Respectfully submitted,

/ Andrew J. Ligotti /

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(requesting *pro hac vice* admission)

Counsel for Patent Owner VB Assets, LLC