

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

Case No. IPR2025-00956
U.S. Patent No. 11,937,992

**DECLARATION OF MARK A. CHAPMAN IN SUPPORT OF
PETITIONER'S NOTICE OF INTENT TO DESIGNATE PROVISIONALLY
RECOGNIZED PTAB ATTORNEYS AS BACK-UP COUNSEL**

I, Mark A. Chapman, hereby declare:

1. I submit this declaration in support of Petitioner Straumann USA, LLC's ("Straumann" or "Petitioner") Notice of Intent to Designate Provisionally Recognized PTAB Attorneys as Back Up Counsel under 37 C.F.R. § 42.10(c)(2) in this inter partes review proceeding IPR2025-00956 for U.S. Patent No. 11,937,992 ("992 patent").

2. I am a partner at the law firm of Haug Partners LLP ("Haug"), where my practice focuses on patent-related matters, and in particular, patent litigation in a variety of technical fields. Lead counsel in this inter partes review proceeding is Sheila Mortazavi, also a partner at Haug, who is registered to practice before the United States Patent and Trademark Office ("USPTO" or "Office") and holds Registration No. 43,343. I have worked and will continue to work closely with Ms. Mortazavi in this proceeding.

3. I have over 20 years of experience in the field of patent law. My practice focuses on patent litigation in district courts, appeals at the Federal Circuit, and Patent Office proceedings including inter partes and post grant review proceedings and reexaminations.

4. I am very familiar with the '992 patent, as well as the legal subject matter, technical subject matter, and prior art discussed in the petition for inter partes review. I have reviewed the '992 patent, its prosecution history, the prior art

discussed in the petition, and the declaration and exhibits accompanying the mentioned petition. I have been and will continue to be actively involved with preparing Petitioner's submissions in this proceeding, with the strategic, factual, and technical aspects of this proceeding, and in counseling and coordinating with Petitioner.

5. I am counsel of record for Petitioner in the civil action *Smart Denture Conversions, LLC v. Straumann USA, LLC*, Case No. 1:24-cv-00507-JCB in the United States District Court for the District of Delaware, in which plaintiff Smart Denture Conversions, LLC has asserted infringement of the '992 patent.

6. Given my familiarity with the subject matter of this proceeding, I have experience and expertise important to representing Petitioner in this proceeding.

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

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

9. I have never had a court or administrative body deny my application for admission to practice.

10. I have never been sanctioned, disbarred, or cited for contempt by any court or administrative body.

11. 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.

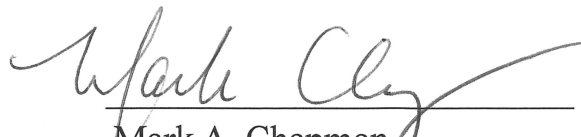
12. I agree to be subject to the USPTO's Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et. seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

13. I have not applied to appear *pro hac vice* before the Office in the last three years. The Board most recently granted me *pro hac vice* admission in IPR2017-01036. *See* IPR2017-01036, Paper 19 (P.T.A.B. Jan. 29, 2018).

14. I have familiarity with the subject matter at issue in this proceeding, as detailed above.

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 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.

Executed on June 23, 2025, at New York, New York


Mark A. Chapman