

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

CM HK LIMITED,
Patent Owner

IPR2025-01023 (U.S. Patent 10,852,846)

DECLARATION OF CHRISTOPHER L. EVANS

I, Christopher L. Evans, declare as follows:

1. I am over the age of 21 and competent to make this declaration.
2. I am a partner at Offor Evans PLLC.
3. All the statements set forth herein are true and correct and are based upon my personal knowledge.
4. To date, CM HK has served 32 requests for production, 15 interrogatives, 5 requests for admissions, and 1 deposition notice in the Texas and California cases combined.
5. To date, Samsung has served 96 requests for production, 29 interrogatories, 13 requests for admissions, and 4 deposition notices combined in the Texas and California cases. Samsung has also produced 1,154 documents.
6. CM HK has produced 1,796 documents and deposed Joseph Anthony Repice, a Samsung fact witness.
7. **Exhibit 2002** is a true and correct copy of the Original Complaint for Declaratory Judgment filed by Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. in the N.D. Cal. On September 18, 2024. Case No. 4:24-cv-06567 at Docket 1.
8. **Exhibit 2003** is a true and correct copy of Samsung Electronics Co, Ltd.'s And Samsung Electronics America, Inc.'s Renewed Motion To Stay Pending

Resolution Of Any Motion to Dismiss the NDCA Action, filed in the E.D. Tex on June 26, 2025. Case No. 2:24-cv-00880 at Docket 46.

9. **Exhibit 2004** is a true and correct copy of Plaintiff, CM HK Ltd.'s Opposition to Defendants' Motion to Dismiss, Transfer, or Stay, filed on July 9, 2025 in E.D. Tex. Case No. 2:24-cv-00880 at Docket 47 (E.D. Tex. July 9, 2025).

10. **Exhibit 2005** is a true and correct copy of Order Granting Defendant CM HK, Ltd.'s Motion To Dismiss the N.D. Cal. Action. *Samsung Electronics Co., Ltd., et al., v. CM HK, Ltd.*, Case No. 4:24-cv-06567 at Docket 73.

11. **Exhibit 2006** is a true and correct copy of the Joint Stipulation and Order to Stay All Deadlines in the Scheduling Order, in the N.D. Cal Action. *Samsung Electronics Co., Ltd., et al., v. CM HK, Ltd.*, Case No. 4:24-cv-06567 at Docket 80 (N.D. Cal June 10, 2025).

12. **Exhibit 2007** is a true and correct copy of Joint Claim Construction and Prehearing Statement. *Samsung Electronics Co., Ltd., et al., v. CM HK, Ltd.*, Case No. 4:24-cv-06567 at Docket 72 (N.D. Cal May, 13, 2025).

13. **Exhibit 2008** is a true and correct copy of Plaintiff's Original Complaint for Patent Infringement, filed in the E.D. Tex on November 1, 2024. *CM HK, Limited, v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:24-cv-00880 at Docket 2.

14. **Exhibit 2009** is a true and correct copy of Plaintiff's Amended Complaint for Patent infringement, filed in the E.D. Tex on January 28, 2025. *CM HK,*

Limited, v. Samsung Electronics Co., Ltd., et al., Case No. 2:24-cv-00880 at Docket 17.

15. **Exhibit 2010** is a true and correct copy of the Docket Control Order entered in the E.D. Tex. On March 3, 2025.

16. **Exhibit 2011** is a true and correct copy of CM HK Ltd.'s P.R. 3-1 & 3-2 Disclosure from the lawsuit styled CM HK Limited v. Samsung Electronics Co., Ltd. et al, No. 2:24-cv-00880 (E.D. Texas) that were served on January 7, 2025.

17. **Exhibit 2012** is a true and correct copy of Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.'s Local Patent Rule 3-3 Disclosure from the lawsuit styled CM HK Limited v. Samsung Electronics Co., Ltd. et al, No. 2:24-cv-00880 (E.D. Texas) that were served on March 4, 2025.

18. **Exhibit 2013** is a true and correct copy of the time to trial statistics from Docket Navigator specifically for Judge Gilstrap of the Eastern District of Texas.

19. **Exhibit 2014** is a true and correct copy of the time to trial statistics from Docket Navigator for the Eastern District of Texas.

20. **Exhibit 2015** is a true and correct copy of U.S. Patent Application Pub. No. 2011/0199298, Bassompierre et. al.

21. **Exhibit 2016** is a true and correct copy of an email chain between Ariell Bratton and myself from March 3, 2025, to May 2, 2025.

22. **Exhibit 2017** is a true and correct copy of the March 24, 2025 Directors Memo.

23. **Exhibit 2018** is a true and correct copy of the Patent Trial and Appeal Board, FAQs for Interim Processes for PTAB Workload Management from <https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management> accessed on August 15, 2025.

24. **Exhibit 2019** is a true and correct copy of the U.S. Patent Application Pub. No. 2009/0262074, Nasiri et al.

25. **Exhibit 2020** is a true and correct copy of the U.S. Patent Application Pub. No. 2011/0163950, Ye et al.

26. **Exhibit 2021** is a true and correct copy of the U.S. Patent Application Pub. No. 2011/0175806, Ye et al.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: August 18, 2025

/s/ Christopher L. Evans

Christopher L. Evans