UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,

Petitioner,

v.

SECURE COMMUNICATION TECHNOLOGIES, LLC,

Patent Owner.

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Case IPR2025-01183

U.S. Patent No. 11,687,971

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**DECLARATION OF JAMES PROCTOR, JR. IN SUPPORT OF PATENT OWNER'S BRIEF IN SUPPORT OF DISCRETIONARY DENIAL**

I, James Proctor, Jr., hereby declare as follows:

1. My name is James Proctor, Jr. I am a co-inventor of the patent challenged in this proceeding. I submit this declaration in support of Patent Owner Secure Communication Technologies, LLC's ("SCT") Brief in Support of Discretionary Denial. I have personal knowledge of the facts and statements herein. I am competent to testify to the matters stated in this declaration, and each of the facts and statements set forth below is true and correct.

2. In November 2011, I emailed Kyle Enright, who I understand to have then been the Head of Business Development for Mobile Payments at Google, about the inventions disclosed in the family of the patent challenged in Petitioner Google LLC's ("Google") IPR petition. A true and accurate copy of that email is included with SCT's Brief as Exhibit 2002.

3. On February 9, 2012, I emailed Amar Mehta, who I understand to have then been an attorney at Google, concerning the patent family to which the challenged patent belongs. A true and accurate copy of that email is included with SCT's Brief as Exhibit 2004.

4. I 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 this 8th day of September, 2025, in Laconia, NH.

James Proctor, Jr.