UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION

Petitioner

v.

SECURITY FIRST INNOVATIONS, LLC

Patent Owner

DECLARATION OF MICHAEL LORIA

I, Michael Loria, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I was previously employed by International Business Machines Corporation ("IBM") in the IBM Security Systems Division.

2. During my employment in the IBM Security Systems Division, I held the position of Vice President of Business Development from 2011 to (and including) 2020.

3. I first became involved in discussions between IBM and Security First Corporation ("SFC") in 2012.

4. As part of my role as Vice President of Business Development, I set up meetings and facilitated and participated in discussions between SFC's and IBM's employees to try to help SFC market and sell its products.

5. IBM acquired a company called Cleversafe Inc. ("Cleversafe").

6. After the acquisition, in or around 2016, John Mumaugh from SFC requested information on IBM's newly-acquired Cleversafe technology. I understood that request to be for the purpose of investigating whether IBM infringed SFC's patents.

7. In response, I assisted in arranging a meeting between SFC and relevant IBM personnel to share information related to the request from Mr. Mumaugh for SFC to review in the context of its patents, and told Mr.

Mumaugh to inform me following the meeting if SFC determined there is an issue.

8. Subsequently, Mr. Mumaugh informed me on behalf of SFC that there was no issue and that SFC would not pursue any patent infringement action against IBM.

9. I and IBM relied on Mr. Mumaugh's and SFC's representation and, as a result, on behalf of IBM I continued to facilitate discussions between SFC's and IBM's employees to try to help SFC market and sell its products.

10. All statements made herein of my own knowledge are true, and all statements made on information and belief are believed to be true. Further, 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 18 U.S.C. § 1001.

* * *

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 8, 2025

Michael Loria

Michael Loria