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.

Case IPR2025-01202
Patent 9,135,456

**DECLARATION OF COLETTE WOO
IN SUPPORT OF PATENT OWNER'S NOTICE OF INTENT
TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY
COLETTE WOO AS BACKUP COUNSEL
UNDER 37 C.F.R. § 42.10(c)(2)**

I, Colette Woo, declare as follows:

1. I am an attorney licensed to practice law in the State of California.

2. I am a member in good standing in all jurisdictions where I have been admitted to practice.

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

4. I have never had an application denied for admission to practice before any court or administrative body.

5. I have never had any sanctions or contempt citations imposed upon me 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 set forth in part 42 of 37 C.F.R.

7. I agree to be subject to the U.S.P.T.O. 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).

8. I am an associate at the law firm of Lowenstein & Weatherwax LLP.

9. I have practiced law in California since 2020, and the majority of my practice has consisted of patent related matters such as PTAB litigations.

10. My experience in post-grant patent proceedings includes drafting patent owner responses, taking depositions, and presenting oral arguments before the Board. Representative matters where I am or was actively involved include:

- *International Business Machines Corporation v. Security First Innovations, LLC* (IPR2025-01200, -01201).
- *Samsung Electronics Co., Ltd. et al v. Radian Memory Systems LLC* (IPR2025-01266, -01289, -01321, -01350, -01376, -01377, -01378).
- *Amazon.com Inc. et al v. DivX, LLC* (IPR2025-01062, -01222, -01223).
- *Infineon Technologies Americas Corp. v. MOSAID Technologies Inc.* (IPR2025-01171).
- *NVIDIA Corporation v. Neural AI, LLC* (IPR2025-00606, -00608, -00609, -00610).
- *DirecTV, LLC v. Entropic Communications, LLC* (IPR2024-01061, -01064).
- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2025-00180, -00181, -00182; IPR2024-00432, -00433, -00434, -00435, -00436, -00437, -00438, -00439, -00440, -00446, -00452).

- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00462, -00560).
- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).
- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).
- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).
- *Apple Inc. v. SEVEN Networks, LLC* (IPR2020-00236, -00254, -00255, -00280, -00281, -00285, -00584, -00506, -00507).

11. The following are the most recent prior proceedings in which I was recognized *pro hac vice* before the Board, with admission granted on November 22, 2024:

- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2024-00432, -00435, -00438, -00446).

12. I have previously been granted admission by the PTAB to appear *pro hac vice* in the following matters before the U.S.P.T.O within the last three years:

- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2024-00432, -00435, -00438, -00446).

- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00462).
- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).
- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).
- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).

13. I have been previously designated a provisionally recognized *pro hac vice* PTAB attorney in the following matters:

- *Amazon.com Inc. et al v. DivX, LLC* (IPR2025-01062, -01222, -01223).
- *NVIDIA Corporation v. Neural AI, LLC* (IPR2025-00606, -00608, -00609, -00610).

14. I have previously applied for admission, *pro hac vice*, in the following matters before the U.S.P.T.O. which were terminated before the application was granted:

- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00560).

15. I am concurrently applying for *pro hac vice* admission in the following matters:

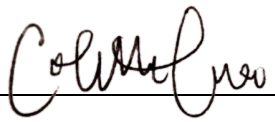
- *International Business Machines Corporation v. Security First Innovations, LLC* (IPR2025-01200, -01201).

16. Other than the matters identified in ¶¶ 10-15 *supra*, I have not applied to appear *pro hac vice* in any other proceedings before the U.S.P.T.O. in the last three years.

17. I have an established familiarity with the subject matter at issue in this proceeding. I have reviewed the Patent at issue as well as the Petition, the relevant art in this matter, and all other papers in the proceeding to date that have addressed the merits.

18. 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.

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 are 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.



Colette Woo
LOWENSTEIN & WEATHERWAX LLP

Date: September 17, 2025