

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

DIALECT, LLC,
Patent Owner

Case No. IPR2025-01335
U.S. Patent No. 8,015,006

**DECLARATION OF SHAYNE O'REILLY
IN SUPPORT OF PETITIONER'S OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL**

I, Shayne O'Reilly, declare as follows:

1. I am the Director & Associate General Counsel, Head of Licensing & Open Source at Meta Platforms, Inc. ("Meta") and the primary contact for Meta's membership with Unified Patents ("Unified Patents"). I am over 21 years old and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others, and if called as a witness, I could and would competently testify to the matters set forth herein.

2. Meta exercised its sole discretion and control in filing the petition in the IPR2025-01335 against U.S. Patent No. 8,015,006 ("the '006 Patent"), including paying all fees and expenses. No individuals or entities other than Meta's employees, counsel, and consultants acting under the direction of counsel had any prior knowledge of the filing of the instant IPR. Unified Patents had no involvement in the preparation of, payment for, or decision to file this petition.

3. I understand that an *ex parte* reexamination ("EPR") has been filed against the '006 Patent by Unified. Meta did not have any prior knowledge of, or involvement in, the preparation and filing of the request for the EPR on the '006 Patent. Meta had no discussions with Unified Patents to challenge the '006 Patent. Meta did not direct Unified Patents in identifying the patent or group of patents to be considered for the EPR.

I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and 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.

Dated: November 19, 2025

By: Shayne O'Reilly
Shayne O'Reilly