**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.,

Petitioner,

v.

WACOM CO. LTD.,

Patent Owner.

Patent No. 9,977,519
Issued: May 22, 2018
Filed: Feb. 19, 2016

Inventors: Jeff Lukanc et al.
Title: ACTIVE PEN WITH BIDIRECTIONAL COMMUNICATION

*Inter Partes* Review No. IPR2025-01533

# DECLARATION OF PAYTON GEORGE IN SUPPORT OF SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.'S MOTION FOR *PRO HAC VICE* ADMISSION OF PAYTON GEORGE UNDER 37 C.F.R. § 42.10(c)

I, Payton George, declare as follows:

1. I am an attorney licensed to practice law in the state of Minnesota.

2. I am a member of good standing of the Bar of the state of Minnesota and in the District of Columbia.

3. I am also admitted to practice before the United States District Court for the District of Minnesota, the United States Bankruptcy Court for the District of Minnesota, the United States District Court for the District of Colorado, the United States District Court for the Eastern District of Michigan, and the United States District Court for the Eastern District of Wisconsin.

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

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

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

7. I have never had any sanctions or contempt citations imposed by any court or administrative body.

8. 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 the C.F.R.

9. I agree to be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. §11.19(a).

10. I am an Associate at the law firm of Dorsey & Whitney, LLP ("Dorsey") and am assisting the litigation team for Petitioner, Shenzhen Qianfenyi Intelligent Technology Co., Ltd. ("Maxeye") in the related district court litigation, *Wacom Co. Ltd. v. Shenzhen Qianfenyi Intelligent Technology Co., Ltd.*, Civil No. 2:24-cv-702-JRG (E.D.T.X.) ("E.D.T.X. Litigation"). I joined Dorsey as an Associate in October 2018.

11. I am a litigation attorney with specific experience in patent law and patent law litigation. I have represented clients in numerous patent infringement actions across the country.

12. I have not applied to appear pro hac vice in any proceedings before the United States Patent and Trademark Office in the last three (3) years.

13. I have an established familiarity with the subject matter at issue in this proceeding. I have familiarity with the subject matter at issue in this proceeding and in the related E.D.T.X. Litigation in which U.S. Patent Nos. 9,280,220; 9,977,519; 10,108,277; 10,437,356; 9,690,399; 9,933,866; and 10,768,720 were asserted by the Patent Owner in August 2024. Since that time, I have closely studied the asserted patents and participated in discovery related to the same. I have acquired substantial understanding of the underlying issues at stake in this matter.

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 and that such willful false statements may jeopardize the validity of the patents at issue.

Dated: October 10, 2025

Respectfully submitted,

/Payton George/
Payton George
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## CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing document was served via email to Petitioner by serving the correspondence email addresses of record as follows:

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Respectfully submitted,

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