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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

MOTIVE TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSARA INC.,

Defendant.

CASE NO. 3:24-cv-00902-JD

DECLARATION OF DAVID S. BLOCH IN SUPPORT OF MOTIVE'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Hon. James Donato
Date: July 3, 2025
Time: 10 a.m.
Courtroom 11, 19th Floor

Samsara EX1048
Samsara v. Motive
IPR2026-00108

I, David S. Bloch, declare:

1. I am a shareholder at the law firm of Greenberg Traurig, LLP, counsel of record for Motive Technologies, Inc. I am a member in good standing of the Bars of the State of California and the District of Columbia, as well as the Bar of this Court.

2. Motive seeks to amend its complaint by adding U.S. Patent Nos. 12,136,276 (the "'276 patent") and 12,062,243 (the "'243 patent"). Motive could not assert the '276 and '243 patents in its original complaint or first amended complaint because the patents had not yet issued at the time those pleadings were filed. Moreover, this case was stayed at the times these new patents issued.

3. Following the issuance of the '276 and '243 patents, Motive's counsel undertook a diligent review of the patents and investigated potential infringement. Based on that investigation, we ultimately determined that Samsara's products infringe the '276 and 243 patents, in addition to the currently asserted U.S. Patent No. 11,875,580.

4. Upon the Court's lifting of the stay in this case, Motive promptly prepared its Second Amended Complaint, supporting infringement claim charts, and this motion for leave to amend—well in advance of the parties' stipulated deadline to amend the pleadings.

5. **Exhibit 1** is a true and correct copy of the proposed Second Amended Complaint and all exhibits thereto.

6. **Exhibit 2** is a redline comparing the proposed Second Amended Complaint and Exhibit B thereof, against the operative Amended Complaint (ECF 40) and Exhibit B thereof (ECF 40-2).[1]

7. Motive does not seek to gain any unfair advantage by adding these two patents at this early stage of litigation.

8. As of the date of this declaration, the Court has not entered a scheduling order. Only limited discovery has been served, and by agreement (ECF 90) the parties exchanged substantive discovery responses on May 27, 2025.

[1] Exhibit B to the complaint also is being updated to reflect discovery to date, but this revision is no more than confirming existing claims to proof and would otherwise be produced in the near term under the Patent Local Rules.

9. Motive would be prejudiced if forced to needlessly expend additional time and resources to file a separate action asserting the '276 and '243 patents against the same defendant and substantially the same accused products.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Tiburon, CA.

DATED: May 29, 2025

By: */s/ David S. Bloch*
David S. Bloch