

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID INC.,
Petitioner,

v.

SIX TREES CAPITAL LLC
and
SECURE AUTHENTICATION TECHNOLOGIES LLC,
Patent Owner.

IPR2026-00157
U.S. Patent No. 11,315,090

**DECLARATION OF GARY ZIMMERMAN IN SUPPORT OF
PATENT OWNER'S REQUEST FOR DISCRETIONARY
DENIAL OF INSTITUTION**

I, Gary Zimmerman, declare and state as follows:

1. I am the Chief Executive Officer of Six Trees Capital LLC. I have served in this role for more than 12 years. I also serve as a Manager of Secure Authentication Technologies LLC.

2. Six Trees Capital LLC develops a product called Max, which is a financial tool developed in the United States that connects depositors with trusted financial institutions. Max enables its customers to earn more on their cash deposits while keeping funds liquid and fully-insured in their own bank accounts. To operate, Max must gain secure access to users' online accounts, some of which are protected by multi-factor authentication in the manner described in the '090 patent's claims.

3. Since May 9, 2022, shortly after the '090 patent's issuance, Six Trees has posted a notice for the '090 patent (and other patents in the same patent family before then) on its website and in other marketing materials to mark its product. As of May 9, 2022, this notice identified "U.S. Patent Nos. 10,268,995, 10,510,082, 10,657,504, 11,315,090, and other patents pending" as protecting the Max product.

4. I have personal knowledge of the facts stated in this declaration and could testify competently to them if asked to do so. My employment with Six Trees Capital LLC and Secure Authentication Technologies LLC and my employment compensation are not contingent upon the substance of my declaration, any statements made, or any outcome of this matter.

5. In signing this declaration, I recognize that the declaration will be filed as evidence in a contested case before the Patent Trial and Appeal Board of the United States Patent and Trademark Office. I also recognize that I may be subject to cross-examination in the case and that cross-examination will take place within the United States. If cross-examination is required of me, I will appear for cross-examination within the United States during the time allotted for cross-examination.

* * *

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. I further declare that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Respectfully submitted,

Date: March 16, 2026

/s/ Gary Zimmerman
Gary Zimmerman