

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRATEGY INC.,
Petitioner,

v.

WEB3AI TECHNOLOGIES, LLC,
Patent Owner.

Case No. IPR2026-00223
U.S. Patent No. 9,218,574

DECLARATION OF JOSEPH J. HAWKINS

I, Joseph J. Hawkins, declare under penalty of perjury as follows:

1. I am a partner at Laurence & Phillips IP Law, and I am backup counsel for the Patent Owner, Web3AI Technologies, LLC (“Web3AI”), in the case identified on the cover page. I have personal knowledge of the facts stated in this declaration and have personally reviewed the documents discussed herein. If called as a witness, I could and would competently testify to such facts under oath.
2. Exhibit 2007 is a true and correct copy of “The Use and Misuse of Forward Citations in Patent Infringement Damages,” which states that “academic studies generally agree that the mean number of forward citations is relatively small, at 13, while the median number of forward citations is zero.” I downloaded this article on or around March 26, 2026 from <https://www.stout.com/en/insights/article/use-misuse-forward-citations-patent-infringement-damages>.
3. Exhibit 2008 is a true and correct copy of a search that I performed on March 26, 2026, using the public search tools available from the USPTO at <https://ppubs.uspto.gov/pubwebapp/>, indicating that the forward citation count of U.S. Patent No. 9,218,574 for U.S. patents was 210 as of March 26, 2026 (with self-citations omitted).

4. I 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 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 the Title 18 of the United States Code. I further acknowledge that willful false statements in this declaration may jeopardize the validity or enforceability of U.S. Patent No. 9,218,574.
5. I acknowledge that I may be subject to cross-examination in the United States as part of this *inter partes* review. If cross-examination is required of me, I will make myself reasonably available for cross-examination within the United States during the time allotted for cross-examination.

Executed on March 27, 2026

Respectfully Submitted

/Joseph J. Hawkins/

Joseph J. Hawkins

Reg. No. 63,194