

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.

Petition

er v.

BULLETPROOF PROPERTY MANAGEMENT, LLC.

Patent Owner.

IPR2026-00227
Patent 11,932,230

**DECLARATION OF ROBERT J. RANDO IN SUPPORT OF PATENT
OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF
ROBERT J. RANDO UNDER 37 C.F.R. § 42.10(c)**

Rando Declaration in Support
of PHV Admission

I, Robert J. Rando, resident of New York State, declare as follows:

1. I am an attorney at the law firm of Patrick Doerr, LLP, counsel of record for Patent Owner Bulletproof Property Management, LLC (“Patent Owner”). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently under oath.

2. I am a member in good standing of New York State, United States District Court For The Southern District Of New York, United States District Court For The Eastern District Of New York, United States Supreme Court, United States Court Of Appeals For The Federal Circuit, United States Court Of Appeals For The Armed Forces, United States Court Of Federal Claims, United States Court Of Appeals For The Second Circuit, United States Court Of International Trade, United States District Court For The Northern District Of New York.

3. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrative body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

Rando Declaration in Support
of PHV Admission

4. I have read, fully understand, 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 Title 37 of the C.F.R. I acknowledge and agree that I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). I have not applied for *pro hac vice* before the Office within the last three years.

5. I received a B.S. degree in Mathematics and Computer Science from Hofstra University in 1983. I earned a J.D. degree from St. John's School of Law in 1989. Prior to entering the legal profession, I was a Systems Analysis Engineer at Sperry Corporation (currently Lockheed Martin) for seven years where I performed analysis, under a government required classified security clearance, of the Trident Submarine navigation and weapons subsystems. I designed, developed, implemented, and analyzed computer software utilizing advanced sophisticated high-powered mathematical analysis techniques.

6. I joined Patrick Doerr July 15, 2025, as a Partner. I am currently a member of their Intellectual Property group and in charge of their patent litigation. Collectively, since graduating law school, I have practiced patent litigation for over 36 years.

Rando Declaration in Support
of PHV Admission

7. I have an established familiarity with the subject matter at issue in this proceeding. I have been actively involved in the related district court litigation between the Petitioner and Patent Owner, *Bulletproof Property Management LLC, v. Tesla, Inc.*, Case No. 1:25-cv-00665 (W.D. Tex. 2025).

8. U.S. Patent No. 11,932,230 (“‘230 Patent”), which is at issue in this proceeding, is one of the patents asserted by Patent Owner in the district court litigation. I am lead counsel in the district court litigation. I have been actively involved in all aspects of the litigation, including Patent Owner’s factual investigation and development of its claim construction positions, validity positions, and infringement positions regarding the claims of the ‘230 Patent at issue here.

9. I have been actively involved in analyzing and assisting with responding to the Petition for *Inter Partes* Review submitted in this proceeding.

10. As a member of the New York Intellectual Property Law Association (“NYIPLA”), I have participated in, and periodically co-moderated, the NYIPLA PTAB Committee Monthly CLE Webinars on PTAB IPR, PGR, and CBM practice.

Rando Declaration in Support
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11. 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 so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of February 2026, in New York State.

By: /s/ Robert J. Rando

Robert J. Rando
(*pro hac vice* requested)
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