UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AT&T SERVICES, INC. and STREAMWIDE, INC.
Petitioners,

v.

BK TECHNOLOGIES, INC.
Patent Owner

Case: IPR2026-00349

U.S. Patent No. 12,375,890

DECLARATION OF PASCAL BEGLIN

I, Pascal Béglin, hereby declare as follows:

1. I am more than eighteen (18) years of age, and I am competent to make this declaration. I have personal knowledge of the facts stated herein and would testify to such facts under oath if asked to do so.

2. I am the Chief Executive Officer of StreamWIDE Inc. ("StreamWIDE"), one of the Petitioners who has filed Petitions for *Inter Partes* Review ("IPR") of Patents 11,997,568 and 12,375,890 and who has also sought

intervention in the underlying patent litigation, captioned *BK Technologies Inc. v. AT&T Mobility, LLC, et al.*, No. 26-cv-00090 (E.D. Tex.).

3. I submit this Declaration in support of StreamWIDE's Opposition to the Discretionary Denial Briefs submitted by BK Technologies, Inc. ("BK Technologies").

4. StreamWIDE, founded in 2001, has been a global communications software developer that designs, develops, deploys, and maintains real-time communications platforms used by public-safety agencies, governmental entities, and enterprise customers worldwide.

5. StreamWIDE has operated for more than 20 years in the critical communications industry and developed mission-critical software solutions long before it engaged with BK Technologies.

6. One of StreamWIDE's principal software platforms is Team On The Run ("TOTR"), a comprehensive communications platform that enables secure, instant, group communications between remote teams and push-to-talk functionality.

7. StreamWIDE had already developed TOTR and a guest-user function before it began working with BK Technologies in 2022. StreamWIDE started developing TOTR's guest-user functionality as early as 2019, and that functionality was sold and in use by 2021.

8. Prior to 2022, TOTR's guest-user functionality already allowed users to invite non-subscribers into private and group conversations by sending the guest a URL to download the application or connect to the web interface. Guest users could thus obtain access through this activation process and participate in communications despite not being subscribers to the applicable organization.

9. BK Technologies first approached StreamWIDE in approximately March 2022 regarding the use and customization of StreamWIDE's existing TOTR platform.

10. StreamWIDE did not approach BK Technologies seeking technology or intellectual property. Rather, BK Technologies sought customization of StreamWIDE's preexisting software platform, TOTR.

11. BK Technologies did not have the technical expertise to develop their own system. So, in April 2022, BK Technologies requested that StreamWIDE develop and maintain a custom communications solution and implement a particular workflow on top of StreamWIDE's already-existing TOTR platform, including its guest-user functionality.

12. StreamWIDE thereafter worked with BK Technologies to customize and tailor TOTR to meet BK Technologies' requested requirements. This work included development of a specific module built upon StreamWIDE's preexisting guest-user technology.

13. StreamWIDE designed, invented, and deployed functionality enabling designated users to invite guest users, create and manage groups or channels, control participant access, add or remove users from groups, and revoke guest-user access. These capabilities were implemented through native functionalities of the TOTR platform.

14. By June 20, 2022, StreamWIDE had fully designed and invented the product that met BK Technologies' specifications, and a functioning version of that product had been developed prior to execution of the parties' reseller agreement. The product was released by July 8, 2022.

15. BK Technologies filed U.S. Patent Application No. 17/844,488 on June 20, 2022, after StreamWIDE had already designed the relevant product functionality.

16. After the design work had been completed, StreamWIDE and BK Technologies executed a reseller agreement in or about July 2022 governing use of the product and related services ("Reseller Agreement").

17. StreamWIDE disputes the characterization that the technology embodied in TOTR and its guest-user functionality constitutes intellectual property that originated with BK Technologies. The guest-user functionality of TOTR predates StreamWIDE's relationship with BK Technologies.

18. StreamWIDE further disputes the assertion that it acknowledged BK Technologies' alleged ownership of all relevant intellectual property associated with the accused functionality. Under the Reseller Agreement, StreamWIDE retained ownership of products, technology, and know-how that existed prior to the BK Technologies project, while BK Technologies' rights were limited to certain "Reseller Improvements" identified in the agreement.

19. StreamWIDE's employees were responsible for designing, inventing, and implementing the guest-user functionality predating its relationship with BK Technologies and the guest-user functionality envisioned by BK Technologies.

20. On or around June 2024, AT&T approached StreamWIDE for assistance in implementing its FirstNet Fusion platform in furtherance of AT&T's contract with the FirstNet Authority.

21. AT&T was familiar with TOTR but sought to work with StreamWIDE to customize the platform to meet its needs. AT&T provided StreamWIDE with its high-level requirements and spent months working with StreamWIDE to reach its desired product.

22. Unlike StreamWIDE's existing TOTR at the time or the platform that StreamWIDE had developed for BK Technologies, AT&T sought to implement a guest function that simplified the manner in which non-affiliated users joined push-to-talk.

23. FirstNet Fusion requires all users to operate under a license, independently download the application, and enter an Affiliate ID associated with their license in order to join the network. In other words, once a new user downloads the application and enters the Affiliate ID, the user has immediate access to the channels and talkgroups designated by the organization. Therefore, unlike the platform developed for BK Technologies, no link is generated and sent via email or text message.

24. Moreover, AT&T had no knowledge concerning the custom product StreamWIDE had developed for BK Technologies.

25. Neither StreamWIDE nor TOTR is affiliated in any way with U.S. Patent No. 9,794,761 ("Mazzarella") or any of the other prior art relied upon in the Petitions.

26. StreamWIDE has agreed not to bring its intended counterclaims against BK Technologies in *BK Technologies Inc. v. AT&T Mobility, LLC, et al.*, No. 26-cv-00090 (E.D. Tex.) for breach of contract and tortious interference if the present IPRs are instituted to ensure that the IPR could resolve all claims of the parallel proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 8/5/2026, 2026

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Pascal Beglin