

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

OURARING, INC.,
Patent Owner.

Case No. PGR2024-00030
U.S. Patent No. 11,868,178

**DECLARATION OF KHANH LEON IN SUPPORT OF
PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION
PURSUANT TO 37 C.F.R. §42.10(C)**

I, Khanh Leon, declare as follows:

1. I am an Associate with the law firm of O'Melveny & Myers LLP. I represent and advise Petitioner Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung") in connection with the above-captioned post grant review ("PGR") proceeding on the patent at issue in this PGR, U.S. Patent No. 11,868,178 ("the '178 Patent").
2. I have been a member in good standing of the Bar of the District of Columbia since 2024 and of the Bar of the State of Texas since 2020. My state bar numbers are: 90025730 (Washington, D.C.), and 24120972 (Texas). I am also admitted to practice before the U.S. Court of Appeals, Federal Circuit (admitted March 2024), U.S. District Court, Texas Western (admitted March 2025), and have appeared pro hac vice before the U.S. District Court, Delaware on multiple occasions.
3. I have five years of experience practicing patent and technology related litigation. I have litigated numerous patent cases across the country, including in Delaware, Texas, and before the International Trade Commission. I also served as a judicial law clerk in the U.S. District Court, Texas Eastern; and the U.S. Court of Appeals, Federal Circuit.
4. I am familiar with the subject matter at issue in this proceeding. I have been actively involved in the present PGR proceeding regarding the '178 Patent. I have reviewed the patent and the prior art being asserted in this PGR proceeding.

5. Moreover, I have advised Petitioner on strategy regarding Petitioner's affirmative arguments in this PGR proceeding, assisted in the drafting of the petition, reviewed the accompanying Declaration of Brian W. Anthony, Ph.D., and worked with Petitioner to find and identify the references relied upon in the petition and to draft other submissions to the Office.

6. I have similarly assisted clients in connection with many patent litigations regarding technology similar to that at issue in this IPR.

7. I have not been suspended or disbarred from practice before any court or administrative body. I have never had an application for admission to practice before any court or administrative body denied. No sanction or contempt citation has been imposed against me by any court or administrative body.

8. I have read 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 37 C.F.R.

9. I agree to and 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).

10. 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 and that such willful false statements may jeopardize the validity of the application or any patents issued thereon.

Respectfully Submitted,

/s/ Khanh Leon

Khanh Leon

O'Melveny & Myers LLP