

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MPL BRANDS NV, INC.,
Petitioner

v.

BUZZBALLZ, LLC,
Patent Owner

PGR2024-00035
U.S. Patent 11,932,441

**DECLARATION OF MICHAEL HILL IN SUPPORT OF PATENT
OWNER'S RESPONSE TO PETITIONER'S OBJECTIONS TO EVIDENCE**

I, Michael Hill, do hereby declare as follows:

1. I am an employee of Haynes and Boone, LLP. My responsibilities include assisting attorneys in conducting legal research and accessing articles, books, or various other publications used for research or evidence purposes. My compensation in no way depends on the contents of this declaration or the outcome of this matter.

2. On March 10, 2025, Adam Erickson, an attorney at Haynes and Boone, LLP, sent an email to the Haynes and Boone library email group requesting that we obtain an article: "Application of structure optimization technique to aluminum beverage bottle design" by J. Han, R. Itoh, S. Nishigama, and K. Yamazaki. This email is included as Appendix A. The email from Mr. Erickson included a link to a page from Google Scholar listing multiple sources for the article, as well as citations to the article.

3. This same day, March 10, 20215, I located the requested article at Springer's website, at the following URL:

<https://link.springer.com/article/10.1007/s00158-004-0485-x>. I purchased the article. I received a confirmation email from Springer, included as Appendix B.

4. I then downloaded the pdf version of the article I purchased and emailed the pdf to Mr. Erickson. That email to Mr. Erickson is included as Appendix C.

5. This declaration is provided to the best of my knowledge and understanding, and based on my personal knowledge and recollection at the time of signing this declaration. I declare that all statements made herein on 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 or Title 18 of the United States Code.

Date: April 1, 2025



Michael Hill

APPENDIX A

From: [Erickson, Adam](#)
To: [Library](#)
Cc: [Webb, Greg](#)
Subject: Access to Article
Date: Monday, March 10, 2025 2:46:00 PM

Hello,

We are working on a patent case about can design. We would like to use this article as evidence: https://scholar.google.com/scholar?cluster=17064144931271937537&hl=en&as_sdt=0,44

Can you please obtain a copy? C/M number is 58822.418US01 if we can't access it with existing subscriptions.

Let me know if you need anything! Thanks!

Adam

HAYNES BOONE

Adam Erickson

Associate

adam.erickson@haynesboone.com

Haynes and Boone, LLP

800 17th Street, NW

Suite 500

Washington, DC 20006-3962

(t) +1 202.654.4531

[vCard](#) | [Bio](#) | [Website](#)

APPENDIX B

From: orders@springer.com
To: [Hill, Michael](#)
Subject: Thank you for your order
Date: Monday, March 10, 2025 4:45:17 PM

EXTERNAL: Sent from outside Haynes and Boone, LLP



2025-03-10

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UNITED STATES

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Product cover



Application of structure optimization technique to aluminum
beverage bottle design 1

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Han, J. (et al.)

Structural and Multidisciplinary Optimization, April 2004, 29,
Issue 4, pp 304 - 311

Article

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APPENDIX C

From: [Hill, Michael](#)
To: [Erickson, Adam](#)
Cc: [Webb, Greg](#); [Schmidt, Stacie](#); [Bernstein, Lee](#)
Subject: RE: Access to Article
Date: Monday, March 10, 2025 4:47:22 PM
Attachments: [Application of structure optimization technique to aluminum beverage bottle design. Structural and Multidisciplinary Optimization_26Apr04.pdf](#)

Hi Adam,

I've attached the article here for you. Please let me know if you need anything else.

Michael

From: Erickson, Adam <Adam.Erickson@haynesboone.com>
Sent: Monday, March 10, 2025 12:46 PM
To: Library <Library@haynesboone.com>
Cc: Webb, Greg <Greg.Webb@haynesboone.com>
Subject: Access to Article

Hello,

We are working on a patent case about can design. We would like to use this article as evidence: https://scholar.google.com/scholar?cluster=17064144931271937537&hl=en&as_sdt=0,44

Can you please obtain a copy? C/M number is 58822.418US01 if we can't access it with existing subscriptions.

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Adam

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