

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intelligent Wellhead Systems, Inc.
Petitioner,

v.

Downing Wellhead Equipment, LLC
Patent Owner

PGR2025-00002
Patent No. 12,134,952

DECLARATION OF JAMES KEMPVANEE

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I, James KempVanEe, on behalf of myself and Cimplifi, a division of System One holdings, LLC (“Cimplifi”), declare that:

1. I am over the age of twenty-one (21) years, of sound mind, and in all respects competent to testify. The facts stated herein are true, correct and within my personal knowledge, and my statements are 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.

2. I am currently employed as the Director of Investigations at Cimplifi. I have over 25 years of experience in digital forensics and hold several internationally recognized certifications in the field as well as a master’s degree in digital forensics. I have provided expert testimony as an expert in digital forensics in both state and federal courts. A true and correct copy of my curriculum vitae (“CV”) is submitted with this declaration as **Attachment A**. If called as a witness in this action, I could and would competently testify to the facts set forth below which are true of my personal knowledge.

3. On September 5, 2024, Cimplifi was retained by Osha Bergman Watanabe & Burton, LLP (“OBWB”) to capture video from the publicly accessible webpages:

- <https://www.facebook.com/downing.us/videos/2227726754168991>
- <https://www.youtube.com/watch?v=X0m9DcnZczE>

4. On September 19, 2024, I accessed Downing’s publicly accessible YouTube post titled “FS Completion System: How it Works” at <https://www.youtube.com/watch?v=>

[X0m9DcnZczE](#) (“the YouTube Post”).

5. The YouTube page contained a single video file and the date displayed on the post showed the video was publicly posted (“Post Date”) on March 05, 2019. I generated a screenshot of the YouTube page displaying the Post Date and have submitted with this declaration as **EXHIBIT 1026**.

6. I used PageVault software (“PageVault”) to download an .MP4 version of the posted video, *FS-Completion-System-How-it-Works-F1651087F.mp4*, submitted with this declaration as **EXHIBIT 1027**.

7. I also preserved the YouTube webpage with PageVault which generated a 2-page PDF document, *PDF REFERENCE #: 1dHmPbMyKdqqaxi1npGfD1*. This document memorializes how the YouTube Post was displayed on September 19, 2024, at 14:48:02 GMT (10:48:02 UTC-4) and is submitted with this declaration as **EXHIBIT 1028**.

8. The underlying components of this post memorialize the date the video file that displayed on September 19, 2024 was originally uploaded and published; both of which occurred on March 05, 2019.

9. On September 19, 2024, I accessed a publicly accessible Facebook post titled “FS Completion System: How it Works” at <https://www.facebook.com/downing.us/videos/2227726754168991> (referred to here as “the Facebook Post”).

10. The Facebook page contained a single video file, and the date displayed on the post showed the video was publicly posted (“Post Date”) on August 27, 2019, at 12:17PM, to which I generated a screenshot, submitted with this declaration as **EXHIBIT 1029**.

11. I preserved the Facebook Post with PageVault, which generated a 4-page PDF document, *PDF REFERENCE #: 2vqMUayjUWSXAU6ZPzBPN9*. This document memorialized how the Facebook Post was displayed on September 19, 2024, at 15:15:10 GMT (11:15:10 UTC-4) and is submitted with this declaration as **EXHIBIT 1030**.

12. I used the Facebook “copy link” feature to generate a URL specifically for the video within the Facebook Post, *https://fb.watch/uH_JUFV5fb/*. I used PageVault to download an .MP4 version of the posted video, *FS-Completion-System-How-it-Works-F1651112F.mp4*, submitted with this declaration as **EXHIBIT 1031**.

13. The underlying components of this post memorialize the date the video file that displayed on September 19, 2024 was originally uploaded onto Facebook, which was August 27, 2019.

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

Executed on November 6, 2024


James Kemp VanEe
Director of Investigations, Cimplifi