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10 *Attorneys for Defendant Triller, Inc.*

11
12 IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 BYTEDANCE INC., TIKTOK INC., and
15 TIKTOK PTE. LTD.,

16 Plaintiffs,

17 v.

18 TRILLER, INC.,

19 Defendant.
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Case No: 4:20-cv-7572-JSW

**DECLARATION OF BRIAN N. PLATT
IN SUPPORT OF DEFENDANT'S
MOTION TO STAY LITIGATION
PENDING *INTER PARTES* REVIEW**

Hon. Jeffrey S. White

1 I, Brian N. Platt declare under criminal penalty of the State of Utah that the following is
2 true and correct.

3 1. I am a member in good standing of the Utah State Bar. I am duly licensed to
4 practice law in the United States District Court for the District of Utah. My *pro hac vice* admission
5 has been granted in this matter.

6 2. I am an attorney with the law firm of Workman Nydegger, representing Defendant
7 Triller, Inc. (“Triller”) in the above-entitled action. I am over the age of eighteen and am competent
8 to testify to all matters contained herein.

9 3. Attached as **Exhibit A** is a true and correct copy of Triller’s petition for *inter partes*
10 review filed on November 10, 2021, against the asserted claims of U.S. Patent No. 9,648,132.

11 4. Attached as **Exhibit B** is a true and correct copy of Triller’s petition for *inter partes*
12 review filed on November 10, 2021, against the asserted claims of U.S. Patent No. 9,992,322.

13 5. Attached as **Exhibit C** is a true and correct copy of Triller’s petition for *inter partes*
14 review filed on November 10, 2021, against the asserted claims of U.S. Patent No. 9,294,430.

15 6. Attached as **Exhibit D** is a true and correct copy of U.S. Patent Application
16 Publication No. 2005/0021750 (Abrams).

17 7. Attached as **Exhibit E** is a true and correct copy of U.S. Patent Application
18 Publication No. 2006/0008256 (Khedouri).

19 8. Attached as **Exhibit F** is a true and correct copy of U.S. Patent No. 8,572,169
20 (Partovi).

21 9. Attached as **Exhibit G** is a true and correct copy of U.S. Patent Application
22 Publication No. 2010/0031366 (“Knight 2010”).

23 10. Attached as **Exhibit H** is a true and correct copy of the PTAB Trial Statistics FY21
24 End of Year Outcome Roundup IPR, PGR, CBM, available at
25 https://www.uspto.gov/sites/default/files/documents/ptab_aia_fy2021_roundup.pdf.

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11. Attached as **Exhibit I** is a true and correct copy of the Assignment of Patents and Patent Applications for the three Asserted Patents, available at: <https://legacy-assignments.uspto.gov/assignments/assignment-pat-54469-99.pdf>.

I declare under penalty of perjury of the United States that the content of this declaration is true and correct to the best of my personal knowledge and understanding.

Dated: November 11, 2021 /Brian N. Platt/