

IPR2022-00222
Patent No. 10,621,228

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

MEMORYWEB, LLC

Patent Owner

Patent No. 10,621,228

Inter Partes Review No. IPR2022-00222

DECLARATION OF JENNIFER HAYES

IPR2022-00222

Patent No. 10,621,228

I, Jennifer Hayes, hereby declare as follows:

1. I am an attorney at Nixon Peabody LLP, attorneys for MemoryWeb, LLC (“Patent Owner”) in the above-captioned *inter partes* review.

2. Submitted with Patent Owner’s Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2028 is a true and correct copy of Petitioner’s Motion to Seal and For Entry of Protective Order (Paper 10) from *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

3. Submitted with Patent Owner’s Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2029 is a true and correct copy of Petitioner’s Updated Mandatory Notices (Paper 57) from *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

4. Submitted with Patent Owner’s Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2030 is a true and correct copy of the Final Written Decision (Public Version) (Paper 67) from *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

5. Submitted with Patent Owner’s Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas

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to Unified Patents as Ex. 2031 is a true and correct copy of the Decision Granting Director Review (Public Version) (Paper 76) from *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

6. Submitted with Patent Owner's Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2032 is a true and correct copy of the March 13-15, 2023 email chain between counsel for Patent Owner to counsel for Petitioner regarding Patent Owner's Motion to Terminate.

7. Submitted with Patent Owner's Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2036 is a true and correct copy of the June 5-9, 2023 email chain between counsel for Patent Owner and counsel for Petitioner.

8. Submitted with Patent Owner's Brief Addressing Additional Discovery in Support of its Motion to Terminate and Authorization for Third Party Subpoenas to Unified Patents as Ex. 2038 is a true and correct copy of the Order Identifying Real Party in Interest (Public Version) (Paper 79) from *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: June 30, 2023

By: /s/ Jennifer Hayes
Jennifer Hayes