

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO., LTD. et al,

Petitioner

v.

MEMORYWEB, LLC

Patent Owner

Patent No. 10,621,228

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*Inter Partes* Review No. IPR2022-00222

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**DECLARATION OF JENNIFER HAYES**

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. Exhibit 2052, which was previously submitted pursuant to the Board’s August 11, 2023 Order (Paper 44), is a true and correct copy of “3 Questions for Unified Patents CEO Post-Oil States (Part II)” available from the following URL: <https://abovethelaw.com/2018/05/3-questions-for-unified-patents-ceo-post-oil-states-part-ii>.

3. Exhibit 2056, which was previously submitted pursuant to the Board’s August 11, 2023 Order (Paper 44), is a true and correct copy of “Benefits for Large Company Members” available from the following URL: [https://web.archive.org/web/20130907064849/http://www.unifiedpatents.com:80/benefits/large\\_companies.html](https://web.archive.org/web/20130907064849/http://www.unifiedpatents.com:80/benefits/large_companies.html).

4. Exhibit 2057, which was previously submitted pursuant to the Board’s August 11, 2023 Order (Paper 44), is a true and correct copy of “United Patents’ Collaborative Deterrence Approach” available from the following URL: [https://web.archive.org/web/20130413073000/http://www.unifiedpatents.com:80/solution/unified\\_patents.html](https://web.archive.org/web/20130413073000/http://www.unifiedpatents.com:80/solution/unified_patents.html).

5. Exhibit 2058, which was previously submitted pursuant to the Board's August 11, 2023 Order (Paper 44), is a true and correct copy of "NPE Zones" available from the following URL: at [www.unifiedpatents.com/npe/](http://www.unifiedpatents.com/npe/).

6. Exhibit 2059, which was previously submitted pursuant to the Board's August 11, 2023 Order (Paper 44), is a true and correct copy of "Success at Challenging Bad Patents" available from the following URL: <https://www.unifiedpatents.com/success>.

7. Exhibit 2060, which was previously submitted pursuant to the Board's August 11, 2023 Order (Paper 44), is a true and correct copy of "FAQ" available from the following URL: <https://www.unifiedpatents.com/faq>.

8. Exhibit 2061, which was previously submitted pursuant to the Board's August 11, 2023 Order (Paper 44), is a true and correct copy of "NPE Zones" available from the following URL: at [www.unifiedpatents.com/npe/](http://www.unifiedpatents.com/npe/).

9. Submitted with Patent Owner's Motion to Terminate as Exhibit 2081 is a true and correct copy of <https://portal.unifiedpatents.com/ptab/analytics/case-level/top-parties>.

10. Submitted with Patent Owner's Motion to Terminate as Exhibit 2087 is a true and correct copy of MemoryWeb's Subscription Plans available from the following URL: <https://www.memoryweb.me/pricing>.

11. Submitted with Patent Owner's Motion to Terminate as Exhibit 2089 is a true and correct copy of search results from Docket Navigator listing Unified Patents LLC's Patent Trial and Appeal Board filings from March 1, 2021 to the present.

12. Submitted with Patent Owner's Motion to Terminate as Exhibit 2092 is a true and correct copy of "Unified Patents Real Party-in-Interest (RPI) Decisions" available from the following URL: <https://www.unifiedpatents.com/rpi>.

13. Submitted with Patent Owner's Motion to Terminate as Exhibit 2112 is a true and correct copy of the September 24, 2021 letter from Apple's counsel, Bitu Rahebi, addressed to MemoryWeb's counsel, Daniel Schwartz.

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: September 29, 2023

By: /s/ Jennifer Hayes  
Jennifer Hayes