

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EPIC GAMES, INC.,
Petitioner,

v.

INGENIOSHARE, LLC,
Patent Owner

U.S. PATENT NO. 10,142,810
U.S. PATENT NO. 10,708,727
U.S. PATENT NO. 10,492,038

Case IPR2022-00202
Case IPR2022-00291
Case IPR2022-00294
Case IPR2022-00295

**DECLARATION OF LINDSEY Y. SHI IN SUPPORT OF
MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF
PETITIONER EPIC GAMES, INC.**

I, Lindsey Y. Shi, do hereby declare:

1. I am a partner in the law firm Kirkland & Ellis LLP (“Kirkland”). Lead counsel in these *inter partes* review proceedings is W. Todd Baker, who is also a Kirkland partner, is registered to practice before the PTO, and holds Registration No. 45,265. With respect to these proceedings, I work closely with Mr. Baker.

2. I hold a Bachelor of Science degree in Chemical Engineering from the Massachusetts Institute of Technology. I hold a Juris Doctor degree from the University of California, Los Angeles School of Law.

3. I have more than seven years of experience as a litigation attorney specializing in patent litigation. I represent clients in patent litigation matters in various United States District Courts. My experience includes, in relevant part, many matters related to computer systems, computer architectures, computer-based communications, and networked computer technologies. I am, therefore, an experienced patent litigation attorney with particular experience relevant to the technological and legal matters at issue in these proceedings. Petitioner Epic Games, Inc. desires and has a need to be represented in these these proceedings by an experienced patent litigation attorney who has particular expertise relevant to the issues in these proceedings.

4. I am very familiar with U.S. Patent Nos. 10,142,810, 10,708,727, and

10,492,038 and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner's requests for *inter partes* review of these patents, which form the basis for these proceedings. I was counsel for Petitioner in the previous district court action related to these patents (*IngenioShare, LLC v. Epic Games, Inc.*, Civil Action No. 21-cv-00663-ADA (W.D. Tex.), filed June 25, 2021) and was involved with factual and technical developments in that matter.

5. In the present proceedings, I took the deposition of Patent Owner's expert witness, Dr. George Rouskas, on October 27–28, 2022. Unintentionally, I had not yet moved to appear pro hac vice on behalf of Petitioner at the time of the deposition. However, lead counsel for Petitioner, W. Todd Baker (Reg. No. 45,265) served as second chair at the deposition of Dr. Rouskas and was present throughout the entire deposition. Counsel for Patent Owner made no objection to my participation in the deposition and does not oppose my motion to appear pro hac vice.

6. After discovering my omission, I promptly prepared my declaration and concurrent motion to appear pro hac vice.

7. I am a member in good standing of the Bar of the State of California. I am admitted to practice before the United States District Court for the Northern District of California and United States Court of Appeals for Veterans Claims.

8. I have never been suspended or disbarred from practice before any court or administrative body.

9. I have never had a court or administrative body deny my application for admission to practice.

10. I have never been sanctioned or cited for contempt by any court or administrative body.

11. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

12. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

13. I have participated in preparing multiple *inter partes* review petitions. In the past three years, I was admitted pro hac vice as counsel before the PTAB in *Intel Corp. v. PACT XPP SCHWEIZ AG*, IPR2020-00518.

14. I declare that all statements made herein of 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 of Title 18 of the United States Code.

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Date: December 9, 2022

Respectfully submitted,

/s/ Lindsey Y. Shi

Lindsey Y. Shi