UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHANEL, INC.,
Petitioner,

v.

MOLO DESIGN LTD.,
Patent Owner.

Case IPR2022-00545
U.S. Patent No. 9,689,161

DECLARATION OF SHANNON L. BJORKLUND IN SUPPORT OF CHANEL, INC.'S MOTION FOR *PRO HAC VICE* ADMISSION OF SHANNON L. BJORKLUND UNDER 37 C.F.R. § 42.10(c)

I, Shannon L. Bjorklund, declare as follows:

1.   I am an attorney licensed to practice law in the state of Minnesota.

2.   I am a member of good standing of the Bar of the state of Minnesota.

3.   I am also admitted to practice before the United States Court of Appeals for the Federal Circuit; the United States Court of Appeals for the Eighth Circuit; and the United States District Court for the District of Minnesota.

4.   I am a member in good standing in all jurisdictions where I have been admitted to practice.

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

6.   I have never had an application denied for admission to practice before any court or administrative body.

7.   I have never had any sanctions or contempt citations imposed by any court or administrative body.

8.   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 the C.F.R.

9.   I agree to be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. §11.19(a).

10.   I am a Partner at the law firm of Dorsey & Whitney, LLP ("Dorsey") and am counsel of record for Petitioner, Chanel, Inc. ("Chanel") in the related district court litigation, *Molo Design, Ltd. v. Chanel, Inc.*, Civil No. 21-CV-1578 (VEC) (S.D.N.Y.)

("S.D.N.Y. Litigation"). I joined Dorsey as an Associate in January 2011, following a clerkship with the Honorable James B. Loken on the Eighth Circuit Court of Appeals.

11.   I am a litigation attorney with specific experience in patent law and patent law litigation. I have represented clients in numerous patent infringement actions across the country.

12.   I have not applied to appear *pro hac vice* in any proceedings before the United States Patent and Trademark Office in the last three (3) years.

13.   I have an established familiarity with the subject matter at issue in this proceeding. I have familiarity with the subject matter at issue in this proceeding and in the related S.D.N.Y. Litigation in which U.S. Patent Nos. 7,866,366, 8,561,666, 9,689,161 and 9,797,134 were asserted by the Patent Owner in February 2021. Since that time, I have closely studied the asserted patents, participated in discovery related to the same, and submitted claim construction briefing for the terms of the foregoing patents, all of which are part of the same patent family. I have acquired substantial understanding of the underlying issues at stake in this matter.

I hereby 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 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 and that such willful false statements may jeopardize the validity of the patents at issue.

Dated: August 16, 2022

Respectfully submitted,

  /Shannon L. Bjorklund/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the below date, I caused the forgoing to be served by electronic mail to the following:

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