

**DECLARATION OF MR. YAKOV ZOLOTOREV IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Yakov “Jake” Zolotorev, hereby attest to the following:

1. I am a member in good standing of the Bar of the State of California,
as well as the following Federal Courts:
 - a) United States District Courts for the Northern District of California.
2. I have not been suspended or disbarred from practice before any court
or administrative body.
3. I have never had an application for admission to practice before any
court or administrative body denied.
4. No sanction or contempt citation has been imposed against me by any
court or administrative body.
5. I have read and will comply with the Patent Office Trial Practice
Guide and the Board’s Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
6. I will be subject to the USPTO Code 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).
7. In the last three (3) years, I have appeared *pro hac vice* before the
Office in the following matters:

(a) IPR2020-00602 – *NVIDIA Corporation v. Adeia Semiconductor Technologies LLC*; and

(b) IPR2020-00603 – *NVIDIA Corporation v. Adeia Semiconductor Technologies LLC*.

(c) IPR2023-00039 – *Crusoe Energy Systems, LLC v. Upstream Data Inc.*

8. I am a technically trained, experienced patent litigation attorney. I have experience in numerous patent infringement litigation matters in the federal court system. I have experience in *Markman* hearings, patent litigation trials and patent litigation appeals.

9. I have represented Upstream Data Inc. since 2022 and am counsel for Upstream Data Inc. in the co-pending litigation in which U.S. Patent No. 11,574,372 is asserted against Petitioner. I have an established familiarity with the subject matter at issue in this proceeding. In the co-pending litigation, I am a principal attorney responsible for the representation of Upstream Data Inc. While the co-pending litigation is at an early stage, I am involved in infringement case development, and expect to be involved in invalidity and claim construction analysis, all of which are related to the petition requesting post-grant review of U.S. Patent No. 11,574,372. I am also counsel for Upstream Data Inc. in the co-pending PGR2023-00039.

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 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

December 11, 2023

/Yakov Zolotorev/

Yakov Zolotorev

DLA Piper LLP (US)

2000 University Avenue

East Palo Alto, CA 94303

Email: jake.zolotorev@us.dlapiper.com