

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

Civil Action No. 6:21-cv-00735-ADA

JURY TRIAL DEMANDED

**DECLARATION OF STEVEN SEIGEL IN SUPPORT OF ANCORA TECHNOLOGIES,
INC.'S OPPOSITION TO GOOGLE LLC'S MOTION TO STAY**

I, Steven Seigel, declare under penalty of perjury that the following is true and correct:

1. I am over the age of twenty-one (21) years and am an associate in the firm of Susman Godfrey LLP. I am counsel of record for Plaintiff Ancora Technologies, Inc., in the above-captioned litigation. I submit this declaration in support of Ancora's Opposition to Defendant Google, LLC's Motion to Stay Pending *Ex Parte* Reexamination.

2. I am competent to testify as to the matters stated herein, have personal knowledge of the facts and statements in this declaration, and each of the facts and statements is true and correct.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Decision of the Patent Trial and Appeal Board Denying Institution of Covered Business Method Patent Review on December 1, 2017.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Decision of the Patent Trial and Appeal Board Denying Institution of *Inter Partes* Review and Denying Motion for Joinder on June 10, 2021.

5. Attached hereto as Exhibit 3 is a true and correct copy of HTC's Request for *Ex Parte* Reexamination transmitted on September 21, 2021.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Decision Granting *Ex Parte* Reexamination of U.S. Patent No. 6,411,941.

7. Attached hereto as Exhibit 5 is a true and correct copy of the United States Patent and Trademark Office's *Ex Parte* Reexamination Filing Data as of September 30, 2020.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Petition for *Inter Partes* Review of U.S. Patent No. 6,411,941 filed by petitioners Nintendo Co., Ltd., and Nintendo of America Inc. on August 10, 2021.

9. Attached hereto as Exhibit 7 is a true and correct copy of Petition for *Inter Partes* Review of U.S. Patent No. 6,411,941 filed by petitioners Roku, Inc., and VIZIO, Inc., on August 24, 2021.

10. Attached hereto as Exhibit 8 is a true and correct copy of Patent Owner's Preliminary Response to Petition for *Inter Partes* Review Under 37 C.F.R. § 42.107 filed on November 18, 2021.

11. Attached hereto as Exhibit 9 is a true and correct copy of Patent Owner's Preliminary Response to Petition for *Inter Partes* Review Under 37 C.F.R. § 42.107 filed on December 17, 2021.

Dated: December 30, 2021

Respectfully submitted,

/s/ Steven M. Seigel
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