

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

Trend Micro Inc.  
Petitioner

v.

Kajeet, Inc.  
Patent Owner

---

IPR2023-00178  
U.S. Patent No. 7,899,438

---

**DECLARATION OF CRISTINA Q. ALMENDAREZ IN SUPPORT OF  
PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF  
CRISTINA Q. ALMENDAREZ  
PURSUANT TO 37 C.F.R. § 42.10**

I, Cristina Q. Almendarez, declare as follows:

1. I am an associate at Benesch Friedlander Coplan and Aronoff LLP (“Benesch”). I joined Benesch as an intellectual property litigation associate in January 2020.

2. Since joining Benesch, I have primarily focused my practice on patent litigation. In that time, I have gained experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on infringement and validity issues, preparing for depositions of technical experts and fact witnesses, briefing claim construction issues, preparing for Markman hearings, drafting dispositive motions on a range of technical issues, and representing clients in patent litigation trials and hearings before district courts around the country. Further, I have assisted colleagues in proceedings before the Patent Trial & Appeal Board, and I am familiar with its established practices.

3. I am a member in good standing of the Illinois State Bar (Bar No. 6316733). I am also admitted to practice in the United States District Court for the Northern District of Illinois, the Eastern District of Michigan, and the Eastern District of Texas.

4. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any

court or administrated body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

5. 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. I acknowledge and agree that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

6. I have applied for and been granted *pro hac vice* admission before the Office in the following proceedings during the past three years:

- *NortonLifeLock Inc. v. Kajeet, Inc.*, IPR2022-00001 (Oct. 1, 2021);
- *Hewlett Packard Enterprise Co. v. K.Mizra LLC*, IPR2022-00084<sup>1</sup> (Oct. 22, 2021); and
- *Hewlett Packard Enterprise Co. v. K.Mizra LLC*, IPR2022-00843 (April 13, 2022).

7. I have established familiarity with the subject matter at issue this proceeding. I have reviewed in detail and am familiar with U.S. Patent No. 7,899,438 and all exhibits relied upon by Petitioner in this proceeding. Moreover, I have

---

<sup>1</sup> Hewlett Packard Enterprise Company, which filed a petition in IPR2022-00084, and Forescout Technologies, Inc., which filed a petition in IPR2022-00081, were joined as a petitioner in the proceeding, *Cisco Systems, Inc., Forescout Technologies, Inc. and Hewlett Packard Enterprise Company v. K.Mizra LLC*, IPR2021-00593 (March 15, 2021).

engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with Charanjit Brahma, who is a registered practitioner and the lead counsel for Petitioner in this proceeding.

8. 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.

I executed this declaration on December 22, 2022 in Chicago, Illinois.

DATED: December 22, 2022

By: /Cristina Q. Almendarez/  
Cristina Q. Almendarez

BENESCH FRIEDLANDER  
COPLAN & ARONOFF LLP

