

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LIFECORE FITNESS, INC.  
d/b/a ASSAULT FITNESS  
Petitioner,

v.

WOODWAY USA, INC.  
Patent Owner.

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U.S. Patent No. 9,039,580 to Bayerlein et al.

Case No.: IPR2023-00836

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**DECLARATION OF SEYED REZA ROGHANI ESFAHANI IN SUPPORT  
OF PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION**

**DECLARATION OF SEYED REZA ROGHANI ESFAHANI IN SUPPORT  
OF PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Seyed Reza Roghani Esfahani, hereby declare the following:

1. I joined Brooks Kushman P.C. as an intellectual property litigation associate in 2019 after graduating law school. I received my J.D. from the University of Michigan in 2019. I hold a bachelor's and a master's degree in chemical engineering from the University of Michigan, which I received in 2014 and 2016, respectively.

2. Since joining Brooks Kushman, I have primarily focused my practice on patent and trade secret litigation. 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 trials and hearings before district courts around the country. I have assisted my colleagues at Brooks Kushman in proceedings before the Board and am familiar with its established practices.

3. I am a good standing member of the State Bar of Michigan. I am admitted to practice in the United States Court of Appeals for the Federal Circuit, and the United States District Courts for the Eastern District of Michigan, Western

District of Michigan, Western District of New York, Eastern District of Texas, and Western District of Texas.

4. I have not been suspended or disbarred from practice before any court or administrative body. I have never had an application for admission to practice before any court or administrative body denied. 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 the Code of Federal Regulations.

6. I will be subject to the U.S. 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).

7. I have established familiarity with the subject matter at issue with this proceeding. I have reviewed in detail and am familiar with U.S. Patent No. 9,039,580 and all exhibits relied upon by Petitioner in this proceeding. I am engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with John M. Halan, 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 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 and that such willful statements may jeopardize the validity of the application or any patents issued thereon.

Respectfully submitted,

Date: May 30, 2024

/ Seyed Reza Roghani Esfahani /  
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