

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLYWHEEL SPORTS, INC.,
Petitioner

v.

PELOTON INTERACTIVE, INC.,
Patent Owner

Case IPR2019-00295
Patent 9,233,276

**DECLARATION OF CHRISTINA VON DER AHE RAYBURN
IN SUPPORT OF *PRO HAC VICE* ADMISSION**

1. I, Christina Von der Ahe Rayburn, make this declaration in support of a motion to be admitted *pro hac vice* as backup counsel for the patent owner, Peloton Interactive, Inc., in *inter partes* review nos. IPR2019-00294 and IPR2019-00295.
2. I am a member in good standing of the State Bar of California.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application for admission to practice before any court or administrative body denied.
5. I have never been sanctioned or cited for contempt by any court or administrative body.
6. I have read and agree to comply with the Office Patent Trial Practice Guide and the Board's Rule of Practice for Trials set forth in part 42 of the Code of Federal Regulations. I submit to be subject to the PTO's code of professional responsibility 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 not appeared *pro hac vice* in any other PTO proceedings in the last three years.
8. I have an established familiarity with the subject matter of this review as a result of having been counsel for the plaintiff, Peloton, in copending litigation in

the United States District Court for the Eastern District of Texas between Peloton and the petitioner. That litigation involves the '085 and '276 Patents under review in IPR2019-00294 and IPR2019-00295.

9. My experience in these cases has provided me with a knowledge of the '085 and '276 Patents and the patentability issues in this IPR.

10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that willful false statements 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 or enforceability of the '085 and '276 Patents.

Dated: December 21, 2018

Respectfully submitted,


Christina Von der Ahe Rayburn