

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AMERICAN AIRLINES, INC.,  
AND  
HILTON DOMESTIC OPERATING COMPANY, INC.,  
Petitioners,

v.

R2 SOLUTIONS LLC,  
Patent Owner.

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Case IPR2023-00666

Patent 8,341,157

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**DECLARATION OF DAVID E. FINKELSON IN SUPPORT OF MOTION  
FOR ADMISSION PRO HAC VICE**

I, David E. Finkelson, Esq., declare as follows:

1. I have been practicing law in the field of intellectual property, and specifically patent litigation, for the last 22 years.

2. I am a partner in the intellectual property group at McGuireWoods LLP.

3. I have been lead counsel on numerous patent litigation cases nationwide.

4. I am a member in good standing of the State Bar of Virginia, and the Bar of the District of Columbia. I am also admitted to practice before the U.S. Supreme Court, the U.S. Court of Appeals for the Federal Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Fourth Circuit, the U.S. Court of Appeals for the Eighth Circuit, the U.S. District Court for the District of Utah, the U.S. District Court for the Eastern District of Virginia, the U.S. District Court for the Western District of Virginia, and the U.S. District Court for the District of Colorado.

5. I have never been suspended or disbarred from practice before any court or administrative body.

6. I have never had an application for admission to practice before any court or administrative body denied.

7. I have never had any sanctions or contempt citations imposed against me by any court or administrative body.

8. 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 Title 37 of the Code of Federal Regulations.

9. I agree to be subject to the USPTO Code of Professional Responsibility as set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

10. U.S. Patent Nos. 7,698,329, 8,190,610, and 8,341,157 are currently asserted against Petitioner Hilton Domestic Operating Company Inc. ("Hilton") in a co-pending litigation, *R2 Solutions LLC v. Hilton Domestic Operating Company Inc.*, Case No. 3:22-CV-2761 (N.D. Tex.) (the "District Court Litigation"). I am lead counsel for Hilton in the District Court Litigation, responsible for overseeing all aspects of Hilton's defense in the District Court Litigation. I am also a senior member of the team that prepared the following Petitions for *Inter Partes* Review: IPR2023-00666, IPR2023-000689 and IPR2023-00690 (the "Petitions").

11. In the foregoing capacities, I have overseen the review of the prior art references set forth in the Petitions. I am intimately familiar with the disclosures of these prior art references, the asserted grounds of invalidity, and the subject matter in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ David E. Finkelson

David E. Finkelson, Esq.

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April 25, 2023

Date