

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NVIDIA CORPORATION,
Petitioner,

v.

NEURAL AI, LLC,
Patent Owner.

Case IPR2025-00609
Patent RE48,438

**DECLARATION OF DR. MASSIMILIANO VERSACE
IN SUPPORT OF PATENT OWNER'S DISCRETIONARY DENIAL BRIEF**

I, Dr. Massimiliano Versace, declare the following:

1. I am co-founder and former CEO at Neurala, Inc. (“Neurala”), the original assignee of the patents-at-issue (U.S. Patent Nos. 8,648,867, RE48,438, and RE49,461). I provide this Declaration in connection with IPR2025-00606, -00608, -00609, and -00610. Unless otherwise stated, the facts contained in this Declaration are based on my personal knowledge. At the time of the events described below, I was serving as CEO of Neurala, and this declaration is based solely on my knowledge from that role. If called upon to testify, I could and would testify competently as to the matter contained in this declaration.

2. From June 15, 2017 to June 26, 2017, I exchanged a series of emails with Messrs. Murali Gopalakrishna, Kashi Anoosheh, and Jeff Herbst from NVIDIA Corp. (“NVIDIA”). Exhibit 2004 is a true and correct copy of this email chain.

3. As can be seen in Exhibit 2004, I sent a presentation to NVIDIA on June 26, 2017 regarding Neurala’s technology. A true and correct copy of that presentation, which I sent to Messrs. Murali Gopalakrishna, Kashi Anoosheh, and Jeff Herbst is attached as Exhibit 2005. As the presentation indicates, I discussed with NVIDIA Neurala’s patent portfolio, including the ’867 patent and also the ’828 patent from which the ’438 and ’461 patents reissued. *See, e.g.*, Ex. 2005 at 10, 18.

4. I certify that all statements made herein of my knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge that willful false statements and the like are made punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

A handwritten signature in black ink, appearing to read "Massimiliano Versace". The signature is written in a cursive style with a large, stylized initial 'M'.

Date: June 15, 2025

Dr. Massimiliano Versace