

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CENTRAL SQUARE TECHNOLOGIES, LLC,
Petitioner.

v.

CARBYNE, LTD.,
Patent Owner.

IPR2025-01179
U.S. Patent No. 11,689,383

DECLARATION OF DAN SINCLAIR

Pursuant to 28 U.S.C. § 1746, I, Dan Sinclair, the undersigned, hereby declare as follows:

1. I am over eighteen years of age, of sound mind, and in all ways qualified and competent to make this declaration. I have personal knowledge of the facts contained in this declaration and they are true and correct.

2. I am a partner in the law firm of Kirkland & Ellis LLP, counsel for CentralSquare Technologies, LLC (“CentralSquare”). Lead counsel in this *Inter Partes* review proceeding is Gianni L. Cutri, who is a partner with the law firm Kirkland & Ellis LLP and is registered to practice before the United States Patent and Trademark Office under Registration No. 52,791. With respect to this proceeding, I will work closely with Mr. Cutri.

3. I have more than 6 years of experience as a litigation attorney who specializes in patent litigation and represents clients in patent litigation matters in various United States District Courts. My experience includes several matters related to medical devices, home monitoring products and services, vehicle telematics, food processing equipment, and construction tools, and I have particular experience relevant to the technological and legal matters at issue in this proceeding. I am, therefore, an experienced patent litigation attorney with particular expertise that is pertinent to this proceeding. CentralSquare desires, and has a need, to be represented in certain aspects of these proceedings by an

experienced patent litigation attorney who has particular expertise that is relevant to the issues in this proceeding.

4. I am very familiar with U.S. Patent No. 11,689,383 (the “Asserted Patent”), and with the legal subject matter, technical subject matter, and prior art discussed in CentralSquare’s Request for *Inter Partes* Review of U.S. Patent 11,689,383. I am currently counsel to CentralSquare in the co-pending litigation relating to the same patent, *CentralSquare Technologies, LLC v. Carbyne, Inc. et al.*, Case No. 1:24-cv-01497, filed on December 4, 2024 in the Western District of Texas.

5. As counsel in the related litigation, I am, and will continue to be, deeply involved in all aspects of the litigation on behalf of CentralSquare, including trial, and therefore have established familiarity with the Asserted Patent.

6. I am a member in good standing of the Bar of the State of Illinois. I am admitted to practice before the United States District Court for the Northern District of Illinois.

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

8. I have never been denied admission to any Bar, court, or administrative body.

9. I have never been sanctioned or cited for contempt by any court of administrative body.

10. I have read and will comply with the Office Patent Trial Practice Guide and the Patent Trial and Appeal Board's Rules of Practice.

11. I agree to be subject to the USPTO 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).

12. In the last three years, I applied to appear *pro hac vice* in:

- *Artoff v. Polaris Industries, Inc.*, 1:22-cv-00514 (D. Or.)
- *Berlanga v. Polaris Industries Inc.*, 2:21-cv-00949 (E.D. Cal.)
- *Burbank v. Polaris Inc.*, 27-CV-20-8522 (Minn. Dist. Ct.)
- *Hellman v. Polaris Industries Inc.*, 2:23-cv-07187 (C.D. Cal.)
- *Lupin Atlantis Holdings, SA v. Xian-Ming Zeng*, 23-cv-61621 (S.D. Fla.)
- *Weber Food Tech. SE & Co. KG v. Provisur Techs.*, 1:25-cv-01333 (D. Del.)
- *CentralSquare Techs. LLC v. Carbyne Ltd.*, 1:24-cv-01497 (W.D. Tex.)

13. I 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 false statements may jeopardize the outcome of IPR2025-01179.

Dated: March 13, 2026

Respectfully submitted,

By: /s/ Dan Sinclair

Dan Sinclair (*pro hac vice* admission to be requested)

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