

**DECLARATION OF MICHAEL BERTELSON**

**REGARDING:**

**IPR2025-01256**

**IPR2025-01257**

**IPR2025-01258**

**IPR2025-01259**

**IPR2025-01260**

**IPR2025-01261**

**IPR2025-01262**

I, Michael Bertelson, hereby declare:

1. I am a partner at Kilpatrick Townsend & Stockton LLP (“Kilpatrick”), where I have worked as an attorney since 2002. My practice primarily focuses on patent law.

2. I have done only limited work on behalf of Apple Inc. (“Apple”). Based on the firm’s billing records, I have recorded less than 13 hours of work for Apple over the past 23 years. I am not one of Kilpatrick’s relationship partners for Apple in any of the Apple matters on which I have worked, and I do not regularly communicate with anyone at Apple. I have not held myself out as Apple’s representative to persons or entities interested in selling or licensing their intellectual property rights to Apple, and Apple has not given me authority to engage in any such negotiation.

3. I understand that Patent Owner Avant Location Technologies LLC (“Avant”) has alleged that the prior owner of the challenged patents notified Apple of the patents through correspondence dated February 6, 2019. I understand that Avant has provided a copy of that correspondence to Apple in a parallel district court litigation. I have reviewed that correspondence, which appears to be an email purporting to be sent to me on February 6, 2019 from Sergio Sánchez of Ballester Intellectual Property SLP (“Ballester IP”) with the subject line “Potential IP Transaction.”

4. To the best of my recollection I do not know Mr. Sánchez or anyone at Ballester IP. I have no recollection of receiving any email communication from Mr. Sánchez or anyone at Ballester IP in February 2019. I have searched my records to the best of my ability and can locate no record of receiving any email communication from Mr. Sánchez or anyone at Ballester IP in February 2019.

5. When I receive emails relating to a firm client for which I do not have a close relationship, my typical practice is to notify an attorney at Kilpatrick who has a relationship with the client and ask that Kilpatrick attorney how he or she would like to handle the correspondence. Had I received the February 2019 email and recognized that it related to Apple, I would have notified a partner who has a relationship with Apple and could advise on how to handle. I have no recollection or record of forwarding any email from Sergio Sánchez or anyone at Ballester IP to anyone at Kilpatrick or to anyone at Apple. I have searched through my archived sent items in my e-mail and confirmed that there is no record of my having forwarded any such email.

6. My email at Kilpatrick is screened by a spam filter to quarantine messages, including messages from unfamiliar senders. I regularly review reports of all the emails sent to me that are quarantined by Kilpatrick's spam filter to identify whether any emails require further action. The reports list the sender's name and the subject line of the email. It is my usual practice not to investigate quarantined

emails from unfamiliar senders with generic subject lines. Because I am not familiar with Mr. Sánchez or anyone at Ballester IP and the email contains a generic subject line, I expect that I would not have released from quarantine or further investigated the February 2019 email from Mr. Sánchez had it been quarantined by Kilpatrick's spam filter. I understand from Kilpatrick's IT department that emails quarantined by the spam filter are deleted 45 days after quarantine unless they are released.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Dated: December 15, 2025



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Michael Bertelson