

DECLARATION OF THOMAS HOBBS

REGARDING:

IPR2025-01256

IPR2025-01257

IPR2025-01258

IPR2025-01259

IPR2025-01260

IPR2025-01261

IPR2025-01262

T.A.H.

I, Thomas Hobbs, hereby declare:

1. I am the Director of IT Operations and Infrastructure at Kilpatrick Townsend & Stockton LLP (“Kilpatrick”). I have worked at Kilpatrick since December 12, 2012, and my work at the firm supports the technology resources utilized by members of the firm.

2. My team is responsible for Kilpatrick’s email system and the engineers have the capability to search the firm’s email records. Michael Bertelson is a partner at Kilpatrick, and the firm has records of emails sent from his firm email address. Those records date back to at least February 2019.


3. In my role as Director of IT Operations and Infrastructure, I am able to authorize access to the email records for employees at Kilpatrick. My team searched through Kilpatrick’s email records, including our web-based email archive, which stores emails that have been sent by the holder of the email account.

4. Based on my directed search of Kilpatrick’s email records, there is no record of Michael Bertelson forwarding or otherwise sending an email mentioning “Sergio Sánchez” or “Ballester Intellectual Property SLP” in or around February 6, 2019. Based on the search of Kilpatrick’s email records, there is no record of Michael Bertelson forwarding or otherwise sending an email mentioning “Potential IP Transaction” in or around February 6, 2019.

5. Kilpatrick's email spam filter quarantines emails that are likely to be spam based on several factors. Kilpatrick's email system provides employees with regular reports of all the emails sent to that employee that have been quarantined by Kilpatrick's email spam filter. The reports list the sender's name and the subject line of the email. Emails quarantined by the spam filter are deleted 45 days after quarantine unless they are released by the recipient.

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


Thomas Hobbs