

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

CAPTION HEALTH, INC.
Petitioner

v.

UNIVERSITY OF BRITISH COLUMBIA
Patent Owner

U.S. PATENT NO. 10,751,029

Inter Partes Review No.: IPR2025-01422

**DECLARATION OF WILLIAM E. MANSKE IN SUPPORT OF
PETIONER'S MOTION FOR ADMISSION *PRO HAC VICE***

CAPTION HEALTH Ex1031
Caption Health, Inc. v.
University of British Columbia
Trial IPR2025-01422

Case No. IPR2025-01422
Declaration of William E. Manske in Support of
Petitioner's Motion for Admission *Pro Hac Vice*

I, William E. Manske, declare as follows:

1. I was admitted to the Minnesota Bar in 2011. I have been practicing law for 14 years. I have been involved in patent litigation and other intellectual property disputes in many jurisdictions, with many different types of technology, including medical device and software matters.

2. I am a member in good standing of the Bar of Minnesota and am admitted to practice before the U.S. District Courts for the District of Minnesota and the Northern District of Illinois. I am also admitted to practice before the U.S. Court of Appeals for the Federal Circuit and U.S. Court of Appeals for the Eighth Circuit.

3. I have previously applied for and received admission to practice *pro hac vice* before the Patent Trial and Appeal Board in the following matters:

- a. Yamaha Golf-Car Company v. Club Car, LLC, IPR2017-02141;
- b. Yamaha Golf-Car Company v. Club Car, LLC, IPR2017-02142;
- c. Yamaha Golf-Car Company v. Club Car, LLC, IPR2017-02143;
- d. Yamaha Golf-Car Company v. Club Car, LLC, IPR2017-02144.
- e. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00126;
- f. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00127;
- g. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00128;
- h. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a

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- Teleflex Innovations SARL et al, IPR2020-00129;
- i. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00130;
 - j. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00132;
Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00134;
 - k. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00135; and
 - l. Medtronic, Inc. et al v. Teleflex Medical Devices SARL f/k/a Teleflex Innovations SARL et al, IPR2020-00136.

4. Apart from this case, I am also applying for admission to practice before the Board in *Caption Health, Inc. v. University of British Columbia*, IPR2025-01066.

5. My Minnesota Bar membership number is 0392348.

6. I have never been suspended or disbarred from practice before any court or administrative agency or tribunal.

7. I have never had a court or administrative agency or tribunal deny my application for admission to practice.

8. No court or administrative agency or tribunal has ever imposed sanctions or contempt citations on me.

9. I have read and will comply with the Patent Office Trial Practice Guide and the Board's Rules for Practice for Trials, as set forth in 37 C.F.R. Part 42.

10. I have read and will be subject to the United States Patent and

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Trademark Office 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).

11. I am intimately familiar with the relevant law and factual circumstances in this proceeding. I have participated in reviewing and drafting papers filed thus far in this proceeding in addition to papers on behalf of Petitioner, Caption Health, Inc. ("Petitioner" or "Caption") in the related *inter partes* review matter challenging U.S. Patent No. 11,129,591 (the "'591 patent") which, as mentioned above, Petitioner filed as IPR2025-01066.

12. I currently represent Petitioner's parent company, GE HealthCare Technologies Inc., and its affiliates in patent and other intellectual property litigation. The technology involved in some of these disputes includes devices and methods to improve upon medical imaging techniques.

13. I hereby declare that, to my own knowledge and upon information and belief, all statements made herein are true or believed to be true. I further understand that, if these statements are found to be willfully made false statements, they are punishable including by fine or imprisonment according to 18 U.S.C. § 1001.

Dated: September 9, 2025

Respectfully Submitted,
/ William E. Manske/
William E. Manske
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