

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.,

Petitioner,

v.

WACOM CO. LTD.,

Patent Owner.

Patent No. 10,108,277

Issued: Oct. 23, 2018

Filed: Feb. 18, 2016

Inventors: Yasuo Oda et al.

Title: POINTER, POSITION DETECTION APPARATUS AND POSITION
DETECTION METHOD

Inter Partes Review No. IPR2025-01596

**DECLARATION OF ERIN KOLTER IN SUPPORT OF SHENZHEN
QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.'S MOTION
FOR *PRO HAC VICE* ADMISSION OF ERIN KOLTER UNDER 37 C.F.R.
§ 42.10(c)**

I, Erin Kolter, declare as follows:

1. I am an attorney licensed to practice law in the states of Washington and California.

2. I am a member of good standing of the Bar of the states of Washington and California.

3. I am also admitted to practice before the United States Court of Appeals for the Federal Circuit; the United States Court of Appeals for the Second Circuit; and the United States District Courts for the Western District of Washington, Central District of California, Northern District of California, Southern District of California, and District of Colorado.

4. I am a member in good standing in all jurisdictions where I have been admitted to practice.

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

6. I have never had an application denied for admission to practice before any court or administrative body.

7. I have never had any sanctions or contempt citations imposed by any court or administrative body.

8. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R.

9. I agree to be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. §11.19(a).

10. I am Of Counsel at the law firm of Dorsey & Whitney, LLP (“Dorsey”) and am counsel of record for Petitioner, Shenzhen Qianfenyi Intelligent Technology Co., Ltd. (“Maxeye”) in the related district court litigation, *Wacom Co. Ltd. v. Shenzhen Qianfenyi Intelligent Technology Co., Ltd.*, Civil No. 2:24-cv-702-JRG (E.D.T.X.) (“E.D.T.X. Litigation”). I joined Dorsey as Of Counsel in May 2017.

11. I am a litigation attorney with specific experience in patent law and patent law litigation. I have represented clients in numerous patent infringement actions across the country.

12. I applied on October 10, 2025, to appear pro hac vice in *Shenzhen Qianfenyi Intelligent Technology Co., Ltd. v. Wacom Co. Ltd.*, IPR2025-01533 (Papers 6, 7). That application is pending.

13. I have an established familiarity with the subject matter at issue in this proceeding. I have familiarity with the subject matter at issue in this proceeding and in the related E.D.T.X. Litigation in which U.S. Patent Nos. 9,280,220; 9,977,519; 10,108,277; 10,437,356; 9,690,399; 9,933,866; and 10,768,720 were asserted by the Patent Owner in August 2024. Since that time, I have closely stud-

ied the asserted patents, participated in discovery related to the same, and submitted invalidity contentions for the foregoing patents. I have acquired substantial understanding of the underlying issues at stake in this matter.

I hereby 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 are 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 validity of the patents at issue.

Dated: October 31, 2025

Respectfully submitted,

/Erin Kolter/

Erin Kolter

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Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing document was served via email to Petitioner by serving the correspondence email addresses of record as follows:

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Dated: October 31, 2025

Respectfully submitted,

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