

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSARA INC.  
Petitioner

v.

MOTIVE TECHNOLOGIES, INC.,  
Patent Owner

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Case IPR2026-00034  
U.S. Patent No. 12,136,276

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**DECLARATION OF VINCENT M. FERRARO**

I, Vincent M. Ferraro, declare that the following is true and correct:

1. I am an attorney with the law firm of Kelley Drye & Warren LLP, and counsel for Patent Owner Motive Technologies, Inc. (“Motive”) in IPR2026-00034.

2. Attached as Exhibit 2001 is a true and correct copy of the Memorandum Opinion issued by the U.S. District Court for the District of Delaware in *Samsara Inc. v. Motive Technologies, Inc.*, Case No. 1:24-cv-00084, on August 14, 2024 (Dkt. 60).

3. Attached as Exhibit 2002 is a true and correct copy of the Scheduling Order issued by the U.S. District Court for the Northern District of California in *Samsara, Inc. v. Motive Technologies, Inc.*, Case No. 3:24-cv-00902 (the “*Motive California Case*”), on August 8, 2025 (Dkt. 115).

4. Attached as Exhibit 2003 is a true and correct copy of a Motion for Partial Stay Pending *Inter Partes* Review filed by Samsara Inc. (“Samsara”) in the *Motive California Case* on November 25, 2025 (Dkt. 147).

5. Attached as Exhibit 2004 is a true and correct copy of Motive’s Opposition to Samsara’s Motion for Partial Stay Pending *Inter Partes* Review filed in the *Motive California Case* on December 9, 2025 (Dkt. 148).

6. Attached as Exhibit 2005 is a true and correct copy of the Invalidity Contentions served by Samsara on November 18, 2025 in the *Motive California Case*.

7. Attached as Exhibit 2006 is a true and correct copy of Motive's Complaint filed in the *Motive California Case* on February 15, 2024 (Dkt. 1).

8. Attached as Exhibit 2007 is a true and correct copy of Motive's Second Amended Complaint filed in the *Motive California Case* on July 9, 2025 (Dkt. 107).

9. In the *Motive California Case*, Motive served infringement contentions and a production of 17,277 pages of documents. Samsara served invalidity contentions and a production of 6,188 pages of documents.

10. In the *Motive California Case*, the parties have exchanged lists of claim terms for construction, proposed claim constructions for each identified claim term, and extrinsic evidence in support of their proposed claim constructions.

11. In the *Motive California Case*, the parties have also expended resources on other fact discovery, including conducting numerous source code inspections (on both sides), serving 264 requests for production and 33 interrogatories, and issuing well over a dozen third-party subpoenas.

12. In the *Motive California Case*, Motive anticipates that some of the same witnesses will need to testify with respect to Samsara's patent infringement counterclaims and Motive's patent infringement claims.

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

Dated: December 23, 2025

*/Vincent M. Ferraro/*  
Vincent M. Ferraro (Reg. No. 79,197)