Docket No.: 0100157-00244

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inventors: DAVID A. FARBER AND RONALD D. LACHMAN

Inter Partes Review of Patent No.: 6,415,280

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Filed:

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Title:

IDENTIFYING AND REQUESTING DATA IN A NETWORK USING

IDENTIFIERS WHICH ARE BASED ON THE CONTENT OF THE

DATA

Mail Stop PATENT BOARD Patent Trial and Appeal Board Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

## DECLARATION OF CYNTHIA VREELAND IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

- I, Cynthia Vreeland, declare as follows:
- 1. I have been practicing law for over twenty years, and have been practicing in the field of intellectual property, and particularly, patent litigation, for more than fifteen years.
- 2. I am a member in good standing of the Bar of the State of Massachusetts and the Bar of the State of Texas, and am admitted to practice before the United States Courts of Appeal for the First, Fourth, and Federal Circuits, the United States District Court for the District of Massachusetts, the United States Court for the Eastern District of Texas and all Massachusetts State and Texas State courts.
- 3. My Massachusetts Bar membership No. is 635143 and my Texas Bar membership No. is 20625150.



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4. I have been in private practice for over twenty years, and litigating patent cases for over fifteen years. Several of these patent litigations concerned patent office rules and regulations. For example, I represented American Superconductor Corporation before the trial court in an interference proceeding in *American Superconductor Corp. v. Massachusetts Institute of Technology* No. 1:01-cv-11477-EFH, in the District of Massachusetts.

- 5. I have never been suspended, disbarred, sanctioned or cited for contempt by any court or administrative body.
- 6. I have never had a court or administrative body deny my application for admission to practice.
- 7. I have read and will comply with Office Patent Trial Practice guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of the C.F.R.
- 8. I agree to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 et. seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
- 9. In the past three years, I have not appeared *pro hac vice* in any proceedings before the United States Patent and Trademark Office.
- 10. I am familiar with the subject matter at issue in this proceeding. I am counsel in *PersonalWeb Technologies LLC v. EMC Corporation and VMware, Inc.*, No. 6:11-cv-00660-LED, E.D. Tex. (served on Dec. 16, 2011), which is related to and involves the same patents at issue in this proceeding.
- 11. I have represented EMC Corporation in multiple patent-related matters since 2003, including confidential patent-related analysis, and the following United States District Courtcases: *EMC v. Hewlett-Packard, No. 4:00-cv-40188-NMG* in the District of



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Massachusetts, Equifax, Inc. v. Verid, Inc. No. 1:06-cv-02404-TCB in the Northern District of Georgia, and EMC v. BetaNet, LLC, No. 1:10-cv-11593-RGS in the District of Massachusetts.

- 12. I am familiar with the technology at issue in this proceeding from the prior work described above.
- 13. 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 are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Respectfully Submitted,

Cyathia Voul

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