
CARDIOCOM, LLC.

Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.

Patent Owner

CASE IPR: IPR2013-00451

Patent No. 7,587,469

AFFIDAVIT OF BAS DE BLANK

**BOSCH 2001
Cardiocom v Bosch
IPR2013-00451**

2. This affidavit is given in support of Patent Owner Robert Bosch Healthcare Systems, Inc.'s Motion for *Pro Hac Vice* Admission of Bas de Blank.

3. I am a partner at the law firm of Orrick, Herrington & Sutcliffe. I am an experienced litigating attorney and have been a litigating attorney for more than 15 (fifteen) years.

4. I have been litigating patent cases for over 15 (fifteen) years.

5. I have litigated patent cases in the area of computerized information systems, the same subject matter as U.S. Patent No. 7,587,469, at issue in this *inter partes* review proceeding.

6. I have an established familiarity with the subject matter at issue in this proceeding. I am counsel for Bosch in a co-pending district court litigation against Petitioner Cardiocom, LLC ("Cardiocom"). That litigation is captioned *Robert Bosch Healthcare Systems, Inc. v. Cardiocom, LLC*, Civil Action No. 2:13-cv-349 (E.D. Tex.) and involves U.S. Patent No. 7,587,469 also at issue in this *inter partes* review proceeding. As counsel for Bosch, I have been actively involved in preparing the technical aspects of the case relating to infringement and validity of the '469 Patent, including detailed analysis of the '469 Patent and its file history. As such, I

7. I am also counsel for Bosch in a second co-pending district court litigation against Cardiocom. That litigation is captioned *Robert Bosch Healthcare Systems, Inc. v. Cardiocom, LLC*, Case No. 5:12-CV-3864-EJD (N.D. Cal.) and involves U.S. Patent Nos. 6,368,273; 6,968,375; 7,252,636; and 8,140,663, which are related to the patent at issue, and U.S. Patent Nos. 7,941,327 and 8,015,025, which involve similar computerized information systems technology as the '469 Patent.

8. I am a member in good standing of the State Bar of California.

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

10. No court or administrative body has ever denied my application for admission to practice before it.

11. No court or administrative body has ever imposed sanctions or contempt citations on me.

12. 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 Code of Federal Regulations.

/Bas de Blank/
Bas de Blank