

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CARDIOCOM LLC
Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.
Patent Owner

Case IPR2013-00451
Patent 7,587,469

Mailed: November 26, 2013

**DECLARATION OF WILLIAM D. SCHULTZ IN SUPPORT OF
PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE***

In support of the Motion for Admission *Pro Hac Vice*, I, William D. Schultz, do declare and state as follows:

1. I am a member in good standing of the Bars of: Minnesota, the United States District Court for the Western District of Wisconsin, the United States Court of Appeals for the Seventh Circuit, the United States Court of Appeals for the Eighth Circuit, and the United States District Court for the District of Minnesota.
2. I have no suspensions or disbarments from practice before any court or administrative body.
3. I have never had any court or administrative body deny my application to practice before said court or administrative body.
4. I have never been sanctioned or cited for contempt by any court or administrative body.
5. 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 37 C.F.R.
6. I will be subject to the USPTO 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).

7. I am applying concurrently to appear *pro hac vice* before the U.S. Patent and Trademark Office in the following proceedings before the Office:

IPR2013-00431;

IPR2013-00439;

IPR2013-00449;

IPR2013-00460;

IPR2013-00468; and

IPR2013-00469.

8. I have been a litigating attorney for more than eleven years.

9. I have been litigating patent cases for at least eleven years.

10. I am second counsel in the case *Robert Bosch Healthcare Systems, Inc. v.*

Cardiocom, LLC, and Abbott Diabetes Care, Inc., No. 2:13-CV-349

(E.D. Tex., filed Apr. 26, 2013), which involves the following U.S.

patents:

7,516,192;

7,587,469;

7,769,605;

7,840,420;

7,870,249; and

7,921,186.

11. I have worked extensively with the expert retained for the litigation identified above and in this proceeding. I have also reviewed the expert's report regarding the invalidity of the patent at issue in this proceeding. I have also worked extensively in developing invalidity positions for the patent at issue in this proceeding. Developing invalidity positions required, for instance, a thorough understanding of the prior art, including the prior art cited in the instant case, as well as a thorough understanding of the patent at issue.
12. I am second counsel in the case *Robert Bosch Healthcare Systems, Inc. v. Cardiocom, LLC*, No. 12-cv-3864 EJD (N.D. Cal., filed July 24, 2012), which involves the following U.S. patents:

6,368,273;

6,968,375;

7,252,636;

7,941,327;

8,015,025; and

8,140,663.

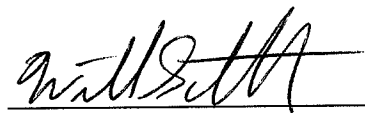
Case IPR2013-00451

Patent 7,587,469

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 were 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.

Nov. 26, 2013

Date



William D. Schultz