

Filed on behalf of: Black Hills Media, LLC  
By: Theodosios Thomas  
Black Hills Media, LLC  
5400 Trinity Rd. Suite 303  
Raleigh, NC 27607  
Tel: (919) 233-1942, Ext. 203  
Fax: (919) 233-9907

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

YAMAHA CORPORATION OF AMERICA  
Petitioner

v.

BLACK HILLS MEDIA, LLC  
Patent Owner

---

Case No. IPR2013-00594  
U.S. Patent 8,050,652

---

***Declaration of Reza Mollaaghababa In Support of  
Motion For Admission Pro Hac Vice***

I, Reza Mollaaghababa, declare as follows:

1. I am an attorney licensed to practice law in the state of Massachusetts, and am a registered patent attorney before the United States Patent and Trademark Office (Reg. No. 43,810). I am a member in good standing in all jurisdictions where I have been admitted to practice.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never had an application denied for admission before any court or administrative body.
4. I have never had any sanctions or contempt citations imposed by any court or administrative body.
5. I have read and agree to 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.
6. I affirm my agreement as a registered practitioner before the USPTO 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).
7. I commonly appear before the USPTO as a registered USPTO practitioner. Other than concurrently seeking to appear *pro hac vice*

in IPR2013-00593 and IPR2013-00597, which were also filed by the Petitioner against patents other than the '652 Patent owned by the Patent Owner, I have not applied to appear *pro hac vice* in any other proceedings before the USPTO in the last three (3) years.

8. I have been a partner at the law firm of Pepper Hamilton LLP since joining the firm in 2012. Previously, I was a partner at the firm of Nutter McClennen & Fish LLP (2005- 2012), and was an associate at Nutter McClennen & Fish LLP (2000-2005), and was a technical specialist at the firm of Lahive & Cockfield (1997-2000). I have extensive experience in patent law and have been involved in patent prosecution and patent litigation for the past 15 years, including in post-grant proceedings such as reexaminations, interferences, and re-issues.
9. I am familiar with the subject matter at issue in this proceeding. As a registered practitioner before the USPTO, I have been engaged by the Patent Owner to represent the Patent Owner before the Board in this proceeding. I have undertaken the study of *inter alia* the '652 Patent, the Petition for *Inter Partes* Review, and the art cited in the Petition. I am also familiar with the co-pending litigations filed by the Patent Owner and identified by the Petitioner in the Petition for *Inter Partes*

Review (pp. 2-4), in which the '652 Patent was asserted against the Petitioner and others in various jurisdictions. I have acquired a substantial understanding of the underlying legal and technological issues at stake in the these proceedings.

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 U.S. Patent No. 8,050,652.

Dated: December 18, 2013

/Reza Mollaaghababa/

Reza Mollaaghababa, Reg. No. 43,810  
Pepper Hamilton LLP  
125 High Street  
19<sup>th</sup> Floor, High Street Tower  
Boston, MA 02210  
Tel: (617) 204-5100  
Fax: (617) 204-5150

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2013, a true and accurate copy of this paper, DECLARATION OF REZA MOLLAAGHABABA IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE* ADMISSION, was served on the following counsel for Petitioner Yamaha of America via email and U.S. Express Mail:

David L. Fehrman  
Mehran Arjomand  
Morrison & Foerster LLP  
707 Wilshire Boulevard  
Los Angeles, CA 90017-3543  
Tel: (213) 892-5630  
Fax: (323) 210-1329

[dfehrman@mof.com](mailto:dfehrman@mof.com)  
[marjomand@mof.com](mailto:marjomand@mof.com)

Dated: December 18, 2013

By: /Theodosios Thomas R45159/  
Theodosios Thomas, Reg. No. 45,159  
Black Hills Media, LLC  
5400 Trinity Rd. Suite 303  
Raleigh, NC 27607  
Tel: (919) 233-1942, Ext. 203  
Fax: (919) 233-9907  
Attorney for Patent Owner