

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR NORTH AMERICA, INC., SUBARU OF AMERICA, INC.,
AMERICAN HONDA MOTOR CO., INC., NISSAN NORTH AMERICA, INC.,
FORD MOTOR COMPANY, JAGUAR LAND ROVER NORTH AMERICA,
LLC, AND VOLVO CARS OF NORTH AMERICA, LLC

Petitioner

v.

CRUISE CONTROL TECHNOLOGIES LLC
Patent Owner

Case IPR2014-00281
U.S. Patent 6,324,463

**DECLARATION OF CHI CHEUNG IN SUPPORT OF
CO-PETITIONER JAGUAR LAND ROVER NORTH AMERICA, LLC'S
MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)**

FILED VIA PRPS

I, Chi Cheung, resident of New York City, NY declare as follows:

1. I am an attorney at the firm of Latham & Watkins LLP, counsel of record for Co-Petitioner Jaguar Land Rover North America, LLC. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently under oath.

2. I am a member in good standing of the State Bar of New York (Admitted July 7, 2009, Registration No. 4740205) and am also admitted to practice before the U.S. District Courts for the Southern District of New York, Eastern District of New York, Eastern District of Michigan and the U.S. Court of Appeals for the Federal Circuit.

3. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrative body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

4. 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 C.F.R. I acknowledge and agree that 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).

5. I have an undergraduate degree in Systems Design Engineering from the University of Waterloo and graduated from Northwestern University School of Law in 2008. I have four years of electrical hardware and computer software work experience from working as an engineering intern during my time at Waterloo, and as a full-time engineer afterwards.

6. I have over six years of patent litigation experience. I am a member of Latham & Watkins intellectual property group, with a focus on patent litigation. In 2014, I was named a "Rising Star" by Super Lawyers magazine in the area of intellectual property litigation.

7. I have been actively involved in the related district court litigation between the Patent Owner and Co-Petitioner JLR, *Cruise Control Technologies LLC v. Jaguar Land Rover North America LLC*, 2:14-cv-11511 (E.D. Mich.) prior to it being stayed. I was admitted to E.D. Mich. for the primary purpose of litigating that matter on May 29, 2014. The '463 Patent, which is at issue in this proceeding, is the sole patent asserted by the Patent Owner in the district court litigation.

8. I have been actively involved in analyzing and assisting with the Petition for *Inter Partes* Review submitted in this proceeding, including

Petitioner's factual investigation and development of its invalidity and claim construction positions regarding the claims of U.S. Patent No. 6,324,463 (the "'463 Patent"). I drafted much of the Petition for Inter Partes Review of the '463 Patent in this proceeding.

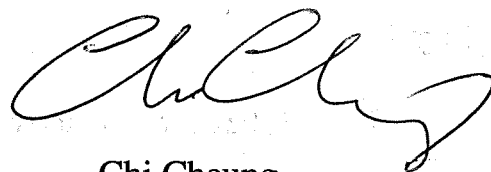
9. I worked closely with Lead Counsel for each of four related petitions submitted in the following four proceedings ("Related IPR Proceedings") involving the same patent (the '463 Patent) that are currently pending before the Patent Trial and Appeal Board:

- Case No. IPR2014-00289;
- Case No. IPR2014-00291;
- Case No. IPR2014-00279;
- Case No. IPR2014-00280.

Co-Petitioner JLR is also a co-petitioner in each of these Related IPR Proceedings.

10. I have not applied to appear *pro hac vice* in any other proceeding before the USPTO.

Executed on March 11, 2015 in New York City, NY.



Chi Cheung

CERTIFICATE OF SERVICE

I certify that on this 11th day of March, 2015, a copy of:

**DECLARATION OF CHI CHEUNG IN SUPPORT OF
CO-PETITIONER JAGUAR LAND ROVER NORTH AMERICA, LLC'S
MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)**

was served by mail on Patent Owner's lead and backup counsel, at the following
addresses:

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Respectfully submitted,

ERISE IP, P.A

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