

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

**CONOPCO, INC. d/b/a UNILEVER**  
**Petitioner**

**v.**

**THE PROCTER & GAMBLE COMPANY**  
**Patent Owner**

---

**Case IPR2014-00507**  
**Patent 6,451,300**

---

**AFFIDAVIT IN SUPPORT OF PATENT OWNER'S MOTION FOR  
*PRO HAC VICE* ADMISSION OF THOMAS R. GOOTS  
PURSUANT TO 37 C.F.R. § 42.10(c)**

**Mail Stop "PATENT BOARD"**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

P&G Exhibit 2010  
Conopco v. P&G  
IPR2014-00507

1. I, Thomas R. Goots, am more than twenty-one years of age, am competent to present this affidavit, and have personal knowledge of the facts set forth herein.
2. This affidavit is given in support of the Patent Owner The Procter & Gamble Company's Motion for *Pro Hac Vice* Admission.
3. I am a Partner at the law firm of Jones Day.
4. I have been a patent litigation attorney for nearly 19 years, and I have been litigating patent cases during that entire time period. I have litigated at least 25 patent infringement actions, including at least 7 involving chemical compositions, including matters for P&G.
5. I am a member in good standing of the State Bar of Ohio. I have never been suspended or disbarred from practice before any court or administrative body.
6. I have never been ultimately denied admission to practice before any court or administrative body.
7. No court or administrative body has ever imposed sanctions or contempt citations on me.
8. 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.

9. I understand 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).

10. I am concurrently seeking *pro hac vice* admission to appear in Patent Owner's co-pending related matters, Cases IPR2013-00505, IPR2014-00506, and IPR2013-00509.



11. I have an established familiarity with the subject matter at issue in this proceeding. I have read and understand the pleadings submitted by Petitioner and Patent Owner in this proceeding and in Cases IPR2013-00505, IPR2014-00506, and IPR2013-00509. I have engaged in hours of strategic and substantive discussions regarding this proceeding with David M. Maiorana, who is the lead counsel for Patent Owner in this proceeding and in Cases IPR2013-00505, IPR2014-00506, and IPR2013-00509. Through my nearly 19 years of patent litigation experience, I am very familiar with the legal theories advanced in this case.

12. I have reviewed in detail U.S. Patent No. 6,451,300 ("the '300 patent"), which is the patent challenged in this proceeding. I have also reviewed Exhibits submitted by Petitioner in this proceeding. I am also counsel of record in litigation involving the '300 patent before the United States District Court for the Southern District of Ohio (Civil Action No. 1:13-cv-732-TSB).

13. I understand that IPR counsel for Petitioner has agreed not to oppose Patent Owner's motion for my *pro hac vice* admission in this proceeding.

  
Thomas R. Goots

Sworn to and subscribed before me this 27<sup>th</sup> day of June, 2014.

  
Notary Public  
  
JANET S. BULESKI  
NOTARY PUBLIC  
FOR THE  
STATE OF OHIO  
My Commission Expires  
August 13, 2016