

DECLARATION OF JONATHAN R. DEFOSSE

I, Jonathan R. DeFosse, declare as follows:

1. I am a member in good standing of the Bar of Virginia and the Bar of the District of Columbia, as well as the following Federal Courts:

United States District Court for the District of Columbia;
United States District Court for the Eastern District of Virginia;
United States Court of Appeals for the Fourth Circuit;
United States Court of Appeals for the Eleventh Circuit;
United States Court of Appeals for the Federal Circuit.

2. I have not been suspended or disbarred from practice before any court or administrative body.

3. I have never been denied admission to practice before any 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 have not applied to appear *pro hac vice* before the Office in the last three (3) years, although I am simultaneously applying to appear *pro hac vice* in

the following *inter partes* review proceedings: IPR2014-00643, IPR2014-00644, IPR2014-00646, and IPR2014-00647.

8. I have an established familiarity with the subject matter at issue in the proceeding, because I am representing Petitioner as a defendant in the related proceeding *American Vehicular Sciences LLC v. Mercedes-Benz U.S. Int'l, Inc.*, No. 6:13-cv-00310 (E.D. Tex.). In this related proceeding, Patent Owner has asserted U.S. Patent No. 6,738,697 against Petitioner. My experience representing Petitioner in this related proceeding, concerning the same patent against the same Patent Owner, provides me with an established familiarity with the subject matter at issue in the current proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 3, 2014


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