

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,  
TSMC NORTH AMERICA CORPORATION,  
FUJITSU SEMICONDUCTOR LIMITED,  
FUJITSU SEMICONDUCTOR AMERICA, INC.,  
ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS  
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,  
GLOBAL FOUNDRIES U.S., INC., GLOBALFOUNDRIES DRESDEN  
MODULE ONE LLC & CO. KG, GLOBALFOUNDRIES DRESDEN MODULE  
TWO LLC & CO. KG, TOSHIBA AMERICA ELECTRONIC COMPONENTS,  
INC., TOSHIBA AMERICA INC., TOSHIBA AMERICA INFORMATION  
SYSTEMS, INC., TOSHIBA CORPORATION, and  
THE GILLETTE COMPANY,

Petitioners

v.

ZOND, LLC  
Patent Owner

---

*Inter Partes* Review Case No. IPR2014-00821

Patent 6,853,142 B2

---

**AFFIDAVIT OF ETAI LAHAV IN SUPPORT OF PATENT OWNER'S  
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Etai Lahav, being duly sworn and upon oath, hereby attest to the

following:

- i. I am a member in good standing of the New York Bar, as well as the following Federal Courts:
  - a) U.S. District Court for the Eastern District of New York;
  - b) U.S. District Court for the Southern District of New York; and
  - c) U.S. District Court for the Eastern District of Texas.
- ii. I have not been suspended or disbarred from practice before any court or administrative body.
- iii. I have never had an application for admission to practice before any court or administrative body denied.
- iv. No sanction or contempt citation has been imposed against me by any court or administrative body.
- v. 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 Code of Federal Regulations.
- vi. 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).
- vii. Other than presently applying to appear *Pro Hac Vice* before the Office in connection with the *Inter Partes* Review proceedings of the patents

- listed below in section ix, I have not applied to appear *Pro Hac Vice* before the Office in any other proceeding in the last three years.
- viii. I am an experienced litigation attorney, with experience in many litigations involving patent infringement in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, trials and hearings, and investigations before the International Trade Commission.
- ix. I am counsel for Patent Owner Zond, LLC, the plaintiff in related on-going litigations in which U.S. Patent Nos. 6805779, 6806652, 6853142, 7147759, 7604716, 7808184, 7811421, 6896775, 8125155, and 6896773 are and were asserted by the Patent Owner. I am familiar with the subject matter at issue in this proceeding as a result of my representation of Zond, LLC, in the related litigation, including the prior art that Petitioner presents in this proceeding, as well as issues of claim construction.

Date: November 26, 2014

/Etai Lahav/  
Etai Lahav  
RADULESCU LLP

Patent No. 6,853,142  
IPR2014-00821

The Empire State Building  
350 Fifth Avenue, Suite 6910  
New York, NY 10118  
etai@Radulescullp.com