

**DECLARATION OF MR. JAMIE B. BEABER IN SUPPORT OF
MOTIONS FOR *PRO HAC VICE* ADMISSION**

Pursuant to 37 C.F.R. § 1.68, I, Jamie B. Beaber, hereby attest to the following:

1. I am a member in good standing of the District of Columbia Bar (2003) and the Michigan Bar (2001), as well as the following Federal Courts:
 - a. United States Court of Appeals for the Federal Circuit (2003)
 - b. District of Columbia Court of Appeals (2003)
 - c. U.S. District Court for the Eastern District of Texas (2013)
 - d. U.S. District Court for the District of Columbia (2013);
2. I have not been suspended or disbarred from practice before any court or administrative body;
3. I have never had an application for admission to practice before any court or administrative body denied;
4. I have never had sanctions or contempt citations imposed by any court or administrative body against me;
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 am currently applying to appear *pro hac vice* in IPR2014-01092, IPR2014-01094, IPR2014-01095, IPR2014-01096, IPR2014-01097, IPR2014-01357,

IPR2014-01359, and IPR2014-01362. I have not applied to appear *pro hac vice* before the Board in connection with any other proceedings in the last three years.

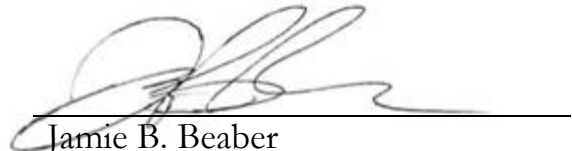
8. I am an experienced litigation attorney and have been involved in numerous patent infringement cases in the U.S. International Trade Commission and in federal District Courts across the country. I have experience in various aspects of patent infringement matters including trials, Markman hearings, and summary judgment hearings.
9. I am lead counsel for the defendants, which include LG Display Co., Ltd., in a co-pending litigation (*Delaware Display Group LLC and Innovative Display Technologies LLC v. LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Display Co., Ltd., and LG Display America, Inc.*, Case No. 1:13-cv-02109 (D. Del.)) in which U.S. Patent Nos. 6,755,547, 7,300,194, 7,384,177, 7,404,660, 7,434,974, 7,537,370, 7,914,196, and 8,215,816 are asserted. I have reviewed and am familiar with the asserted patents, the prior art references, and invalidity claim charts in the co-pending litigation. Further, I have been involved and am familiar with the factual and legal arguments at issue in the co-pending litigation. Accordingly, I am familiar with the subject matter at issue in the *inter partes* reexamination proceedings for the asserted patents.
10. I also entered an appearance as counsel for third parties Dell Inc. in Case No. 2:13-cv-00523 (E.D. Tex.) on September 5, 2014, Hewlett-Packard Company in

Case No. 2:13-cv-00524 (E.D. Tex.) on October 8, 2014, and Hyundai Motor Company, Hyundai Motor America, Hyundai Motor Manufacturing Alabama, LLC, Kia Motors Corporation, Kia Motors America, Inc., and Kia Motors Manufacturing Georgia, Inc. in Case No. 2:14-cv-00201 (E.D. Tex.) on July 9, 2014. Each of these cases involve U.S. Patent Nos. 6,755,547, 7,300,194, 7,384,177, 7,404,660, 7,434,974, and 8,215,816. Case Nos. 2:13-cv-00523 and 2:13-cv-00524 additionally involve U.S. Patent No. 7,537,370. Although these cases do not involve LG Display Co., Ltd., my role in these cases further underscores my familiarity with the subject matter at issue in the IPR proceedings listed at Paragraph 7.

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

Respectfully submitted,

Date: December 3, 2014



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