

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NORMAN INTERNATIONAL, INC.
Petitioner

v.

HUNTER DOUGLAS INC.
Patent Owner

CASE IPR2014-01175
Patent No. 6,968,884

**AFFIDAVIT OF DOUGLAS L. SAWYER IN SUPPORT OF
PETITIONER NORMAN INTERNATIONAL, INC.'S UNOPPOSED
MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. §42.10(c)**

I, Douglas L. Sawyer, being duly sworn and upon oath, hereby apply to appear *pro hac vice* before the Office in the *inter partes* review proceeding under PTAB Case No. IPR2014-01175 on U.S. Patent No. 6,968,884 and hereby attest to the following:

1. I am a member in good standing of the state Bars of Illinois and Colorado, as well as the United States Court of Appeals for the Federal Circuit.
2. I have never 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. No sanction or contempt citation has been imposed against me 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 37 C.F.R. Part 42.
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.P.R. § 11.19(a).
7. I have applied to appear *pro hac vice* before the Office in the following proceeding within the last three (3) years: *Norman International, Inc. v.*

Andrew J. Toti Testamentary Trust, Russell L. Hinckley, Sr. (Co-Trustee) and Robert F. Miller (Co-Trustee), Case IPR2014-00283 (Patent 6,283,192).

8. I am an experienced litigation attorney with more than thirteen years of experience representing clients in patent cases involving computer hardware and software, sporting equipment, semiconductors, RFID devices and systems, smart printers, hand held computers and other mobile devices. I regularly litigate patent cases in various forums including United States Court of Appeals for the Federal Circuit, and various federal district courts. Through my experience in patent litigation matters, I have represented clients in many phases of litigation including discovery, Markman hearings, jury trials, and appeals. My biography is attached hereto as Appendix A.

9. On May 31, 2013, Patent Owner and Hunter Douglas, Inc. filed a lawsuit alleging that Petitioner Norman International, Inc. and other entities infringe several patents, including U.S. Patent No. 6,968,884, in *Hunter Douglas, Inc. et al. v. Nien Made Enterprise Co., Ltd. et al.*, Case No. 1:13-cv-01412-MSK-MJW (D. Colo.). That litigation is ongoing and led to the *inter partes* review proceeding under PTAB Case No. IPR2014-01175.

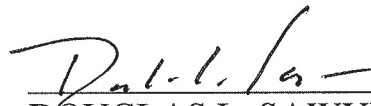
10. I am lead counsel for Petitioner Norman International, Inc. in the above litigation in which I oversee and handle all phases of the litigation from discovery through trial, and will continue to be involved in as the lead counsel. I

am familiar with the technologies, specific designs and issued claims in the 884 Patent and three other asserted patents in the above litigation. I am familiar with the prior art references cited in the PTAB Case No. IPR2014-01175 and the associated invalidity grounds before the PTAB.

I hereby declare that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of the Title 18 of the United States Code.

Respectfully submitted,

Dated: 9-15-2015



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Professional Biography



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Doug Sawyer's practice focuses on intellectual property litigation and enforcement. He has extensive litigation experience, including complex civil litigation, patent and trademark infringement, trade secret misappropriation, false advertising, deceptive trade practices, antitrust and breach of contract. Doug has counseled clients on all aspects of intellectual property procurement and protections. In addition, he has drafted technology-related agreements, including licensing agreements, IP asset purchases and strategic alliances.

PROFESSIONAL RECOGNITION

- Ranked by *Chambers USA* as "America's Leading Intellectual Property Lawyers," 2013 - present
- Listed in *Best Lawyers in America 2015: Litigation - Intellectual Property*
- Named a "Colorado Rising Star," by *Super Lawyers*, 2013 - present
- Recognized as an IP Star by *Managing IP*, 2013, 2014
- Listed in *Intellectual Asset Management Patent 1000*, Litigation Silver Band, 2012; Litigation Gold Band, 2013, Bronze Band 2014

PROFESSIONAL LEADERSHIP

- Colorado IP American Inn of Court, Founder and Current President
- ABA Haiti Task Force, Fellow, present (author of the *Haiti Trial Skills Handbook*)
- American Intellectual Property Law Association
- National Institute of Trial Advocacy, Trial Skills Course (2003)

RELATED EMPLOYMENT

- Mayer Brown, LLP, Chicago, IL , Associate, 2001 - 2007

EXPERIENCE

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