

Filed on behalf of: LG Electronics, Inc.,
LG Electronics U.S.A., Inc., and
LG Electronics Mobilecomm U.S.A., Inc.

Paper _____

By: Jason Shapiro, Lead Counsel
Soumya P. Panda, Back-up Counsel
Brian A. Tollefson, Back-up Counsel
ROTHWELL, FIGG, ERNST & MANBECK, P.C.
607 14th Street, N.W., Suite 800
Washington, DC 20005
Phone: 202-783-6040
Facsimile: 202-783-6031
Emails: jshapiro@rothwellfigg.com
spanda@rothwellfigg.com
btollefson@rothwellfigg.com

Filed: March 10, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., AND
LG ELECTRONICS MOBILECOMM U.S.A, INC.,
Petitioner,

v.

CYPRESS SEMICONDUCTOR CORP.,
Patent Owner.

Case IPR2014-01302
Patent 8,059,015 B2

**DECLARATION OF STEVEN LIEBERMAN IN SUPPORT OF
PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE***

I, Steven Lieberman, declare as follows:

1. I have been practicing in the field of intellectual property, and particularly, patent litigation, for twenty-four years.

2. I am a member in good standing of the Bars of the State of New York and the District of Columbia. I am admitted to practice in the United States District Courts for the District of Columbia, Maryland, the Northern District of California, and the Northern, Eastern, and Southern Districts of New York. I am also admitted to practice in the Courts of Appeals for the District of Columbia, the Second Circuit, the Fourth Circuit, the Federal Circuit, and the United States Supreme Court.

3. I am a past President of the Giles S. Rich American Inn of Court, the D.C. Inn devoted to the practice of intellectual property law.

4. I have been in private practice since 1985 and have been litigating patent cases since 1990, primarily as lead counsel.

5. I have never been suspended or disbarred from practice before any court or administrative body.

6. I have never had a court or administrative body deny my application for admission to practice.

7. No sanctions or contempt citations have ever been imposed against me by any court or administrative body.

8. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R.

9. I agree to 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). I also agree to be subject to the USPTO Rules of Professional Conduct as set forth in Changes to Representation of Others Before the United States Patent and Trademark Office; Final Rule, 78 Fed. Reg. 20180 (Apr. 3, 2013) (effective May 3, 2013).

10. In the past three (3) years, I have been admitted *pro hac vice* in the following proceedings before the United States Patent and Trademark Office:

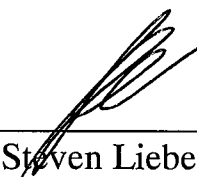
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, CBM2013-00049;
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, CBM2013-00050;
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, CBM2013-00051;
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, IPR2014-00097;
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, IPR2014-00098;
- *International Securities Exchange, LLC v. Chicago Board Options Exchange, Incorporated*, IPR2014-00099;

- *Toshiba Samsung Storage Technology Korea Corporation v. LG Electronics, Inc.*, IPR2014-00204; and
- *Toshiba Samsung Storage Technology Korea Corporation v. LG Electronics, Inc.*, IPR2014-00205.

11. I am familiar with the subject matter at issue in this proceeding. I am lead counsel in the *Cypress Semiconductor Corp. v. LG Electronics, Inc. et al.* patent infringement litigation (Case No. 4:13-cv-04034-SBA), which is pending in the United States District Court for the Northern District of California and involves the same patent at issue in this proceeding.

12. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are 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 Title 18 of the United States Code and that such willful false statements may jeopardize the validity of U.S. Patent No. 8,059,015 B2.

Date: March 9, 2015

By: 
Steven Lieberman
ROTHWELL, FIGG, ERNST &
MANBECK, P.C.
607 14th St., N.W., Suite 800
Washington, DC 20005
Phone: 202-783-6040
Facsimile: 202-783-6031
Email: slieberm@rothwellfigg.com

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of March, 2015, a true and correct copy of the foregoing **DECLARATION OF STEVEN LIEBERMAN IN SUPPORT OF PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE*** was served, via electronic mail upon the following counsel for Patent Owner Cypress Semiconductor Corp.:

Robert R. Laurenzi, Esq.
Kaye Scholer LLP
425 Park Avenue
New York, NY 10022
Phone: (212) 836-8000
Email: robert.laurenzi@kayescholer.com

Robert S. Magee, Esq.
Kaye Scholer LLP
Two Palo Alto Square, Suite 400
3000 El Camino Real
Palo Alto, CA 94306
Phone: (650) 319-4500
Email: robert.magee@kayescholer.com

/Erik van Leeuwen/

Erik van Leeuwen
Litigation Operations Coordinator
Rothwell, Figg, Ernst & Manbeck, P.C.