

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY, INC.  
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION, INC.  
Patent Owner

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Case IPR2014-01415  
Patent 8,214,097

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**DECLARATION OF WILLIAM PETER GUARNIERI IN SUPPORT OF  
PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION**

**DECLARATION OF WILLIAM PETER GUARNIERI IN  
SUPPORT OF PATENT OWNER'S MOTION  
FOR *PRO HAC VICE* ADMISSION**

I, William Peter Guarnieri, hereby declare the following:

1. I am a member in good standing of the state Bars of Virginia and the District of Columbia.
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. 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 part 42 of the Code of Federal Regulations.
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 applied or will apply shortly to appear *pro hac vice* before the Office in IPR2014-01415 and IPR2014-01416.
8. I am a litigation attorney that has been practicing since 2011, representing clients in patent cases involving computer software, computer hardware, consumer

electronics, and semiconductors. I regularly litigate patent cases in federal district courts and the International Trade Commission. Through my experience in patent litigation matters, I have represented clients in many phases of litigation including discovery, Markman proceedings, and bench trial. My biography is attached hereto as Exhibit A. I am counsel for Petitioner Paice and Abell in *Paice LLC, et. al. v. Hyundai Motor Co., et. al.*, No. CIV. WDQ-12-0499 (D. Md.) and *Paice LLC, et. al. v. Ford Motor Company*, No. CIV. WDQ-14-cv-00492 (D. Md.), co-pending district court cases involving U.S. Patent 7,104,347, as well as other patents in the same family. I have been involved in all aspects of representing Paice and Abell in the *Paice v. Hyundai* case since the case was filed in 2012.

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 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 Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patents issued thereon.

Respectfully submitted,



Date: April 29, 2015

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**William Peter Guarnieri**

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## EXHIBIT A



# Peter Guarnieri

## Associate

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## Background

Peter Guarnieri is an Associate in the Washington, DC, office of Fish & Richardson. His practice focuses on patent litigation in Federal District Courts and Section 337 proceedings before the International Trade Commission. His experience covers a broad range of technologies, from complex software applications to 3D graphics accelerators; portable audio docks to consumer digital cameras; and from hybrid-electric vehicles to photonic integrated circuits.

Mr. Guarnieri received his J.D. from Georgetown University Law Center, where he was on the Executive Board of the American Criminal Law Review. He received his B.A. in Computer Science from Duke University.

Prior to joining Fish & Richardson, Mr. Guarnieri was a Senior Consultant with Appian Corporation, developing complex enterprise software for a number of clients, including the U.S. Army's Army Knowledge Online portal. He helped clients achieve success by delivering major enterprise software projects on time and on budget.

### Services

- Litigation
- ITC Litigation
- Patent Litigation

### Industries

- Electrical/Computer Technology
- Hardware
- Internet
- Software
- Transportation

### Education

JD, Georgetown University Law Center 2011  
Executive Board, American Criminal Law Review  
magna cum laude, Order of the Coif

BA, Duke University 2004  
Computer Science  
magna cum laude

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