

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC. and QUANTUM CORPORATION,
Petitioners,

v.

CROSSROADS SYSTEMS, INC.,
Patent Owner.

Case IPR2014-01463
Patent 7,934,041

**AFFIDAVIT OF MATTHEW C. GAUDET IN SUPPORT OF
PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION**

I, Matthew C. Gaudet, being duly sworn and upon oath, hereby attest to the following:

- i. I am a member in good standing of the Bar of Georgia (#287789), as well as the following Federal Courts:
 - a) U.S. Northern District of Georgia;
 - b) U.S. Court of Appeals, 11th Circuit;
 - c) U.S. Middle District of Georgia; and
 - d) U.S. 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. In the last three years, I have not applied to appear *pro hac vice* before the Office.

I am concurrently applying to appear *pro hac vice* before the Office in the following proceedings:

- a) *Cisco Systems, Inc., et al. v. Crossroads Systems, Inc.*,
IPR2014-01544.
 - b) *Cisco Systems, Inc., et al. v. Crossroads Systems, Inc.*,
IPR2014-01226.
- 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 Petitioner Cisco Systems, Inc., the defendant in an ongoing litigation in which U.S. Patent No. 7,934,041 is asserted by the

Patent Owner. I am familiar with the subject matter at issue in this proceeding as a result of my representation of Cisco Systems in the related litigation, including the prior art that Petitioners present in this proceeding, as well as issues of claim construction.

Date: May 11, 2015



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