UNITED STATES PATENT AND TRADEMARK OFFICE

———————

BEFORE THE PATENT TRIAL AND APPEAL BOARD

———————

APPLE INC., HTC CORPORATION, HTC AMERICA, INC., SAMSUNG
ELECTRONICS CO. LTD, SAMSUNG ELECTRONICS AMERICA, INC., AND
AMAZON.COM, INC.
Petitioners,

v.

MEMORY INTEGRITY, LLC
Patent Owner

U.S. Patent No. 7,296,121

———————

Inter Partes Review Case No. 2015-00159

———————

**AFFIDAVIT OF MR. MICHAEL RUECKHEIM IN SUPPORT OF
PETITIONER APPLE INC.'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Michael Rueckheim, being duly sworn and upon oath, hereby attest to the following:

1.   I am a member in good standing of the State Bar of Texas.

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 Code 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 and been granted *pro hac vice* admission before the Office in IPR2014-00901. I am contemporaneously applying for *pro hac vice admission* before the Office in IPR2015-00163 which relates to the patent at issue in this proceeding, U.S. Patent. No. 7,296,121 ("the '121 patent").

8.   I am an experienced litigation attorney with more than 6 years of experience representing clients in patent cases involving technologies such as memory,

computer architecture, wireless transmission, and software. I regularly litigate

patent cases in various forums including 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, bench trials, and

appeals. My biography is attached hereto as Exhibit A. I also represent Apple in

the co-pending litigation involving the '121 patent: *Memory Integrity LLC v. Apple

Inc.*, Case No. 1:13-cv-01796-GMS in the United States District Court for the

District of Delaware, filed on November 1, 2013. I am deeply involved in all

aspects of the Delaware litigation, including claim construction and validity

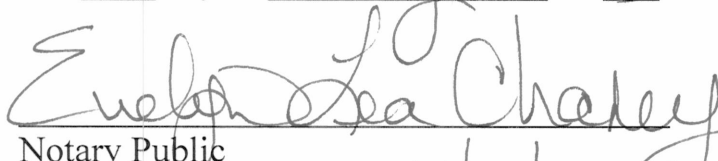analysis, and have significant familiarity with the '121 patent.

Respectfully submitted,

Date: ___July 21, 2015___   _____

Michael Rueckheim
Fish & Richardson P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Tel: (713) 654-5343
Email: rueckheim@fr.com

Sworn to and subscribed before me,
this 21st day of ___July___, 20 15.

___Evelyn Lea Chaney___
Notary Public
My Commission expires: ___7/2/2017___

EVELYN LEA CHANEY
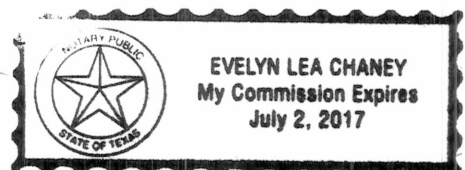My Commission Expires
July 2, 2017

EXHIBIT A

Michael Rueckheim

Houston
713-654-5343
Email rueckheim@fr.com

Services

Litigation

Trade Secret Litigation

Patent Litigation

Sectors

Consumer Products

Hardware

Software

Life Sciences

Medical Devices

Manufacturing

Digital Health

Michael Rueckheim is an Associate in Fish & Richardson's Houston office. Mr. Rueckheim has extensive experience in complex patent and trade secret litigation in a variety of technical fields, including consumer electronics, computer hardware and software, pharmaceuticals, medical devices, and manufacturing equipment. Mr. Rueckheim has represented leading companies in high-stakes cases involving products such as smartphones and music players, tablet computers, microprocessors, high-definition televisions, film-extrusion dies, blood glucose meters, catheters, centrifuges, and topical anti-cancer creams.

Mr. Rueckheim has participated in all stages of litigation from pre-suit investigation to jury verdict and from post-trial matters through appeal in the Federal Circuit. In connection with these litigations, among other things, Mr. Rueckheim has deposed and defended fact and expert witnesses, argued claim construction (*Markman*) positions to the court, and has advised clients on filing patent reexamination requests and conducting discovery abroad. Mr. Rueckheim has represented clients in a variety of federal courts, including in the Eastern District of Texas, the Northern Districts of California and Illinois, and the Districts of Delaware and New Jersey.

In addition to patent litigation, Mr. Rueckheim has participated in a variety of *pro bono* matters, including successfully representing clients at hearings in federal immigration courts and local family courts.

During law school, Mr. Rueckheim was an intern for the Honorable Judge Rodney W. Sippel in the Eastern District of Missouri. Mr. Rueckheim also interned at a large law firm, focusing primarily on patent

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.