

DECLARATION OF JONATHAN R. DEFOSSE

I, Jonathan R. DeFosse, declare as follows:

1. I am a member in good standing of the Bar of Virginia and the Bar of the District of Columbia, as well as the following Federal Courts:

United States District Court for the District of Columbia;
United States District Court for the Eastern District of Virginia;
United States District Court for the Eastern District of Texas;
United States Court of Appeals for the Fourth Circuit;
United States Court of Appeals for the Eleventh Circuit;
United States Court of Appeals for the Federal Circuit.

2. I have not been suspended or disbarred from practice before any court or administrative body.

3. I have never been denied admission to practice before any court or administrative body.

4. I have never been sanctioned or cited for contempt 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 37 C.F.R.

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. In the last three years, I have applied to appear *pro hac vice* before the Office in the following *inter partes* review proceedings: IPR2014-00643,

IPR2014-00644, IPR2014-00645, IPR2014-00646, and IPR2014-00647. I am simultaneously applying to appear *pro hac vice* in the following *inter partes* review proceedings: IPR2015-00359, IPR2015-00361, IPR2015-00363, IPR2015-00366, and IPR2015-00368.

8. I have an established familiarity with the subject matter at issue in the proceeding, because I am representing Petitioners as defendants in the related proceeding, *Innovative Display Technologies, LLC v. Mercedes-Benz U.S. Int'l, Inc., et al.*, No. 2:14-cv-00535 (E.D. Tex.). In this related proceeding, Patent Owner has asserted the following patents (among others) against Petitioners:

U.S. Patent No. 7,384,177
U.S. Patent No. 7,300,194
U.S. Patent No. 6,755,547
U.S. Patent No. 7,404,660
U.S. Patent No. 8,215,816
U.S. Patent No. 7,434,974

9. My experience representing Petitioner in this related proceeding, concerning the same patents against the same Patent Owner, provides me with an established familiarity with the subject matter at issue in the current proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 6, 2015

/s/ Jonathan R. DeFosse
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