

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,  
Petitioner

v.

OpenTV, Inc.,  
Patent Owner.

Case IPR2015-01031  
Patent 7,900,229

**DECLARATION OF MELODY DRUMMOND HANSEN IN SUPPORT OF  
PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION PURSUANT  
TO 37 C.F.R. §42.10(C)**

I, Melody Drummond Hansen, declare as follows:

1. I am a Counsel with the law firm of O'Melveny & Myers LLP. I represent and advise Petitioner Apple Inc. ("Apple") in connection with the above-captioned *inter partes* review ("IPR") proceeding, and I am counsel in the co-pending district court litigation (*OpenTV, Inc. and Nagravision, SA v. Apple Inc.*, Case No. 3:14-cv-01622-HSG (N.D. Cal.)) on the patent at issue in this IPR, U.S. Patent No. 7,900,229 ("229 Patent").
2. I have been a member in good standing of the Bar of the State of California since 2011. My California State Bar number is 278786. I am also admitted to practice before other state and federal courts, including:
  - a. U.S. Court of Appeals, Federal Circuit (admitted September 2013);
  - b. U.S. Court of Appeals, Ninth Circuit (admitted April 2012);
  - c. U.S. District Court, California Central (admitted October 2012);
  - d. U.S. District Court, California Northern (admitted May 2012);
  - e. D.C. Court of Appeals (D.C. Bar) (admitted February 2008);
  - f. U.S. District Court, Illinois Northern (admitted January 2006); and
  - g. Illinois Supreme Court (Illinois Bar) (admitted November 2005).
3. I have 10 years of experience practicing patent and technology-related litigation. I have litigated patent cases across the country, including in California,

Delaware, Virginia, Texas, and the International Trade Commission, and I have litigated cases through trial and appeal.

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

5. I have never had an application for admission to practice before any court or administrative body denied.

6. I have not had a sanction or contempt citation imposed against me by any court or administrative body.

7. 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.

8. I agree to and 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).

9. I have not applied to appear *pro hac vice* before the Office in any other proceeding in the last three years.

10. I am familiar with the subject matter at issue in this proceeding. I have been actively involved in the present IPR proceeding regarding the '229 Patent. I represent Petitioner in the co-pending district court litigation involving the '229 Patent, and I have reviewed the patent, the Patent Owner's infringement

contentions served in the district court litigation, the parties' claim construction positions, and the prior art being asserted in this IPR proceeding.

11. Moreover, I have advised Petitioner on strategy regarding Petitioner's affirmative arguments in this IPR proceeding, reviewed the accompanying Declaration of Dr. Knutson, and worked with Petitioner to find and identify the references relied upon in the petition and to draft submissions to the Office.

12. The prior art reference at issue in the instituted IPR proceeding also is at issue in the co-pending district court litigation. I have reviewed both that art and other related prior art—all of which were disclosed in invalidity contentions that I assisted with. I also have represented clients in connection with other patent litigations regarding technology similar to that at issue in this IPR.

13. 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. I further declare that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Respectfully submitted,

Date: October 26, 2015

/s/ Melody Drummond Hansen  
Melody Drummond Hansen  
O'Melveny & Myers LLP