

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COSTCO WHOLESALE CORPORATION,
Petitioner

v.

ROBERT BOSCH LLC,
Patent Owner

Case No. IPR2016-00038
U.S. Patent No. 6,292,974

**DECLARATION OF MARK A. HANNEMANN IN SUPPORT OF
PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE***

I, Mark A. Hannemann, declare as follows:

1. I am a partner at the law firm of Kenyon & Kenyon LLP, located at One Broadway, New York, NY 10004.

2. I make this declaration in support of Patent Owner Robert Bosch LLC's Motion for my admission *pro hac vice*.

3. I am a member in good standing of the Bar of the State of New York. I am also duly admitted and authorized to practice law before the U.S. Courts of Appeals for the Federal Circuit and the Second Circuit, and the U.S. District Courts for the Eastern District of New York, the Southern District of New York, and the Eastern District of Michigan.

4. I have been practicing law and litigating cases for 20 years. During this time, my practice has focused on patent infringement matters. I have been a first-chair litigator in several patent infringement trials.

5. Since 2007, I have been lead counsel for Patent Owner in numerous patent infringement cases in federal courts and before the U.S. International Trade Commission involving the same subject matter at issue in this proceeding, Patent Owner's beam windshield wiper blade technology. Those cases include: *Robert Bosch LLC v. Alberee Products Inc. et al.*, Civil Action No. 12-574-LPS (D. Del.) (consolidated with Civil Action No. 14-142-LPS (D. Del.)); *Robert Bosch LLC v. Ningbo Xinhai Aiduo Automobile Wiper Blade Manufactory Co.*, No. 2:14-cv-1855

(D. Nev.); *Robert Bosch LLC v. Trico Prods. Corp.*, No. 12-cv-437 (N.D. Ill.); *Robert Bosch LLC v. Corea Autoparts Producing Corp. et al.*, No. 11-14019 (E.D. Mich.); *Robert Bosch LLC v. Jiujiang Yada Traffic Equipment Co. et al.*, No. 2:11-cv-1762 (D. Nev.); *Robert Bosch LLC v. UL Enterprises LLC et al.*, No. 1:11-cv-2437 (N.D. Ill.); *Robert Bosch LLC v. Chin Pech Co., Ltd.*, No. 2:10-cv-1925 (D. Nev.); *Robert Bosch LLC v. Jiujiang Yada Traffic Equipment Co. et al.*, No. 2:10-cv-1926 (D. Nev.); *Robert Bosch LLC v. Ningbo Xinhai Automobile Wiper Blade Manufacturing Co., Ltd.*, No. 2:10-cv-01927 (D. Nev.); *Robert Bosch LLC v. Ocean Automobile Apparatus Co.*, No. 2:10-cv-1928 (D. Nev.); *Robert Bosch LLC v. SHB Int'l, Inc et al*, No. 2:10-cv-1929 (D. Nev.); *Robert Bosch LLC v. ADM 21 Co. et al.*, No. 2:10-cv-1930 (D. Nev.); *Robert Bosch LLC v. Zhejiang Wandeyuan Vehicle Fittings Co.*, No. 2:10-cv-1931 (D. Nev.); *Robert Bosch LLC v. Unipoint Electric Mfg. Co., Ltd. et al.*, No. 2:10-cv-1932 (D. Nev.); *Robert Bosch LLC v. Transbec*, No. 2:10-cv-1933 (D. Nev.); *Robert Bosch LLC v. Old World Industries, Inc.*, No. 1:10-cv-1437 (N.D. Ill.), *Robert Bosch LLC v. Pylon Manufacturing Corp*, No. 1:08-cv-542 (D. Del.), *Robert Bosch LLC v. Jamak Fabrication-Tex Ltd.*, No. 1:07-cv-676 (D. Del.); and *In re Certain Wiper Blades*, Investigation No. 337-TA-816 (U.S. Int'l Trade Comm'n). In each of these cases, Patent Owner asserted patents directed to beam wiper blade technology. U.S. Patent No.

6,292,974, the patent at issue in this IPR proceeding, was also at issue in several of these prior proceedings.

6. I am lead counsel for Patent Owner in a patent infringement case currently pending against Petitioner in the United States District Court for the District of Delaware, *Robert Bosch LLC v. Alberee Products Inc. et al.*, Civil Action No. 12-574-LPS (consolidated with Civil Action No. 14-142-LPS (D. Del.)). U.S. Patent No. 6,292,974, the patent at issue in this IPR proceeding, is also at issue in that action.

7. I have never been suspended or disbarred from practice before any court or administrative body.

8. I have never had a court or administrative body deny my application for admission to practice.

9. No sanctions or contempt citations have ever been imposed against me by any court or administrative body.

10. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R.

11. I agree to 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). I also agree to be subject to the USPTO Rules of Professional Conduct

as set forth in Changes to Representation of Others Before the United States Patent and Trademark Office; Final Rule, 78 Fed. Reg. 20180 (Apr. 3, 2013) (effective May 3, 2013).

12. In the past three (3) years, I have not been admitted *pro hac vice* in any matters pending before the United States Patent and Trademark Office.

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; and further that these statements are 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 U.S. Patent No. 6,292,974.

DATED: October 30, 2015

By: 
Mark A. Hannemann
KENYON & KENYON LLP
One Broadway
New York, NY 10004
Tel: (212) 425-7200

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.