

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. IPR2016-000041
U.S. Patent No. 8,099,823

**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.

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. Albee Products Inc. et al.*, Civil Action No. 12-574-LPS (consolidated with Civil Action No. 14-142-LPS (D. Del.)). U.S. Patent No. 8,099,823, 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. 8,099,823.

DATED: October 30, 2015

By: 
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