

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SL CORPORATION,
Petitioner,

v.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC.
Patent Owner

INTER PARTES REVIEW OF U.S. PATENT NO. 7,241,034

Issue Date: July 10, 2007

Reexamination Certificate Issue Date: June 14, 2013

Title: Automatic Directional Control System for Vehicle Headlights

Inter Partes Review No. IPR2016-00193

DECLARATION OF ADAM P. SAMANSKY

I, Adam P. Samansky, do hereby declare:

1. I am a member in the law firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo P.C. (“Mintz Levin”). Current lead counsel in this *inter partes* review proceeding is Peter Cuomo, who is Of Counsel and is registered to practice before the United States Patent and Trademark Office and holds Registration No. 54,481. The back-up counsel Kongsik Kim and Serge Subach are also registered to practice before the United States Patent and Trademark Office and hold Registration Nos. 63,867 and 74,652, respectively. During this proceeding, I will work closely with Mr. Cuomo and back-up counsel.

2. I am a member in good standing of the Bar of the Commonwealth of Massachusetts and the State of New York. My Massachusetts Bar membership is 661123. My New York Bar membership is 493582. I am admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the First Circuit, United States District Court for the District of Columbia, United States District Court for the District of Massachusetts, United States District Court for the Eastern District of New York, United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of Texas.

3. I am admitted, *pro hac vice*, and am lead trial counsel in the underlying litigation before the U.S. District Court for the District of Delaware, Case No. 1:15-cv-0565.

4. In addition, my 12 years of litigation practice I currently represent or have represented clients in numerous, electrical, mechanical and chemical, patent litigation cases in various United States courts. Those actions include among others:

- *Inline Plastics Corp. v. EasyPak, LLC*, Appeal No. 14-1305 (Fed. Cir.)
- *MeadWestvaco v. Rexam*, Appeal No. 12-1518 (Fed. Cir.)
- *UbiComm v. Bulbs.com*, 1:13-cv-00872-RGA (D. Del.)
- *Dallakian v. IPG Photonics*, 3:14-cv-11863-TSH (D. Mass.)
- *Select Retrieval v. Bulbs.com*, 4:12-cv-10389-TSH (D. Mass.)
- *Samson Manufacturing v. Austin Precision Products*, 1:09-cv-30027 (D. Mass.)
- *Superior Shooting Systems v. Cole*, 3:10-cv-01226 (N.D. Tex)
- *Mitsubishi Chem. Co. v. Barr Labs., Inc.*, 718 F. Supp. 2d 382 (S.D.N.Y. 2010), *aff'd*, 435 Fed. Appx. 927 (Fed. Cir. Aug. 2, 2011)
- *Wellman, Inc., v. Eastman Chem. Co.*, 642 F.3d 1355 (2011), *reh'g and reh'g en banc denied* (Aug. 11, 2011), *cert. denied*, 132 S. Ct. 1541 (2012)
- *Takeda Chem. Indus., Ltd. v. Alphapharm Pty., Ltd.*, 492 F.3d 1350 (Fed. Cir. 2007), *cert. denied*, 552 U.S. 1295 (2008)
- *Takeda Chem. Indus., Ltd. v. Mylan Labs. Inc.*, 417 F. Supp. 2d 341 (S.D.N.Y. 2006)
- *Takeda Chem. Indus., Ltd. v. Mylan Labs., Inc.*, 549 F.3d 1381 (Fed. Cir. 2008), *cert. denied*, 552 U.S. 1295 (2009)

5. In addition to my J.D. obtained from Suffolk University, I hold a B.S. in Politics from Brandeis University. Accordingly, I am comfortable and experienced with technically and legally complex matters such as those raised in this *inter partes* review proceeding. In particular, I am experienced with

technically and legally complex matters in the fields of electrical and mechanical engineering.

6. I am familiar with U.S. Patent No. 7,241,034 (“the ‘034 patent”), its prosecution history, and the legal subject matter, technical subject matter, and prior art discussed in Petitioner’s request for *inter partes* review of the ‘034 patent.

7. I was substantially involved with the preparation of the Petition filed in this proceeding. In particular, I have worked with former lead counsel David Cotta and pending replacement lead counsel Peter Cuomo on scientific and strategic matters pertaining to the instant Petition and now-instituted IPR proceeding. As a result, I anticipate being significantly involved in the deposition and trial phase of this proceeding.

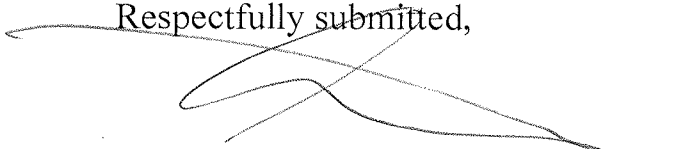
8. I have never been suspended or disbarred from practice before any court or administrative body, nor has a court or administrative body denied my application for admission to practice. I have not been sanctioned or cited for contempt by any court or administrative body.

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

10. I agree to be subject to the United States Patent and Trademark Office 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).

11. I 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 are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Respectfully submitted,



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Dated: June 24, 2016