

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR COMPANY LTD., HYUNDAI MOTOR AMERICA,
HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC, KIA MOTORS
CORPORATION, KIA MOTORS AMERICA, INC.,

KIA MOTORS MANUFACTURING GEORGIA, INC., NISSAN NORTH
AMERICA, INC., NISSAN MOTOR CO., LTD., and AMERICAN HONDA
MOTOR CO., INC.,

Petitioner,

v.

BLITZSAFE TEXAS, LLC,

Patent Owner.

Case IPR2016-00418¹

Patent 8,155,342 B2

**NISSAN MOTOR CO., LTD. AND NISSAN NORTH AMERICA, INC.'S
AFFIDAVIT IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION OF MICHAEL T. MURPHY**

¹ Cases IPR2016-01533, IPR2016-01557, and IPR2016-01560 have been joined with this proceeding.

I, Michael T. Murphy, being duly sworn and upon oath, hereby attest to the following pursuant to this Board's decision in *Unified Patents v. Parallel Iron, LLC*, IPR2013-00639:

i. I am a member in good standing of the Maryland and District of Columbia Bars, as well as the following Federal Courts: a) U.S. District Court for the District of Maryland; b) U.S. Court of Appeals for the Federal Circuit; and c) U.S. Court of Appeals for the Eleventh Circuit.

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

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

iv. No sanction or contempt citation has been imposed against me by any court or administrative body.

v. 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 the Code of Federal Regulations.

vi. 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).

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

viii. I am an experienced litigation attorney, with experience in many litigations involving patent infringement in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, Markman hearings, motion practice, trials and hearings.

ix. My firm serves as counsel for Petitioner Nissan North America, Inc. with respect to patent prosecution matters. I am familiar with the subject matter at issue in this proceeding as a result of my firm's representation of Nissan North America, Inc. with respect to patent prosecution matters. Additionally, I have counseled Petitioners on intellectual property matters related to their business.

x. I declare that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true, and 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.

Date: February 2, 2017



Michael T. Murphy