

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner

v.

DSS TECHNOLOGY MANAGEMENT, INC.,

Patent Owner

Case IPR2016-00782

Patent No. 6,784,552

**AFFIDAVIT OF JARED BOBROW IN SUPPORT OF
PETITIONER'S MOTION FOR ADMISSION
PRO HAC VICE OF JARED BOBROW**

I, Jared Bobrow, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the State Bar of California. I was admitted to the California State Bar on June 16, 1988. My California Bar membership number is 133712. I am admitted to practice before the District Courts of the Northern, Central, Southern and Eastern Districts of California, and the Eastern District of Texas. I am also admitted to practice before the U.S. Court of Appeals for the Federal Circuit, Ninth Circuit, and First Circuit. For over 25 years, my practice has been focused on the field of intellectual property, particularly patent litigation.

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

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

4. I have never had any sanctions or contempt citations imposed on me by any court or administrative body.

5. 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.

6. 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).

7. I have applied to appear *pro hac vice* before this office in the following proceedings in the past three years: CBM2014-00091, CBM2014-00092, and CBM2014-00093. I was admitted to practice in these proceedings as back-up counsel on March 10, 2015, subject to filing a supplemental declaration, which filing occurred on March 19, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2015-00657, IPR2015-00658, IPR2015-00660, IPR2015-00662, and IPR2015-00666. I was admitted to practice in these proceedings as back-up counsel on May 29, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2014-01197, IRP2014-01207, and IPR2014-01209. I was admitted to practice in these proceedings as back-up counsel on September 16, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2016-00320, IRP2016-000322, IPR2016-00323, and IPR2016-000330. I was admitted to practice in these proceedings as back-up counsel on September 26, 2016.

8. I am an experienced litigation attorney, with particular experience in patent infringement litigations 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.

9. I am counsel for Samsung Electronics Co., Ltd. (“Samsung”), Petitioner and a defendant in a related pending litigation in the United States District Court for the Eastern District of Texas, in which U.S. Patent No. 6,784,552 is and was asserted by the Patent Owner. (*DSS Technology Management, Inc., v. Samsung Electronics Co., Ltd.*, 15-cv-690 (E.D. Tex.)). I am familiar with the subject matter at issue in this proceeding as a result of my representation of Samsung in the related litigation, including the prior art that Petitioner presents in this proceeding. I am familiar with the invalidity defenses raised in the related litigation and have reviewed and am familiar with prior art raised in this proceeding, including Kuesters et al., *Self Aligned Bitline Contact for 4 MBIT DRAM* (Ex. SAMSUNG-1005); U.S. Patent No. 5,482,894 to Havemann (Ex. SAMSUNG-1006); and U.S. Patent No. 4,686,000 to Heath (Ex. SAMSUNG-1007). I have reviewed the briefs and papers filed in this proceeding and in *inter partes* review proceedings involving U.S. Patent No. 6,784,552 and related patents.

I declare that all statements made herein of my own knowledge are true and correct.

Dated: October 3, 2016

/Jared Bobrow/

Jared Bobrow