

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioners,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,  
Patent Owner.

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Case IPR No.: IPR2016-01135  
Patent 5,812,789

**DECLARATION OF AMIR ALAVI IN SUPPORT OF PATENT OWNER'S  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF AMIR  
ALAVI UNDER 37 C.F.R. § 42.10(c)**

PUMA Exhibit 2008

APPLE - PUMA IPR 2016-01135

I, Amir Alavi, being duly sworn and upon oath, hereby attest to the following:

1. I am an attorney with the AZA law firm and represent the Patent Owner Parthenon Unified Memory Architecture LLC (“PUMA”) in the above captioned proceeding. I am submitting this declaration in support of Patent Owner’s Unopposed Motion for *Pro Hac Vice* Admission of Amir Alavi Under 37 C.F.R. § 42.10(c).
2. I am a member in good standing of the Bar of Texas, as well as the following Federal Courts:
  - a) U.S. District Court for the Northern District of Texas;
  - b) U.S. District Court for the Southern District of Texas;
  - c) U.S. District Court for the Western District of Texas;
  - d) U.S. District Court for the Eastern District of Texas; and
  - e) U.S. Court of Appeals for the Fifth Circuit.
3. I have not been suspended or disbarred from practice before any court or administrative body;
4. I have never had an application for admission to practice before any court or administrative body denied;
5. I have never been subject to any sanction or contempt citation imposed by any court or administrative body.
6. 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.

7. 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).
8. I have applied to appear *pro hac vice* before the Office in IPR2015-01500; IPR2015-01501; IPR2015-01502; IPR2016-00923; and IPR2016-00924 in the last three (3) years; and
9. I am an experienced litigation attorney, with experience in a significant number of District Court litigation involving patent infringement, including jury trials and Markman hearings. My biography is attached as Exhibit 2008. I am lead counsel for Parthenon Unified Memory Architecture in a co-pending litigation in which U.S. Patent No. 5,812,789 is asserted against HTC Corporation, HTC America, Inc., and Apple Inc. In those cases I have been directly involved in all aspects of the case, including arguing two Markman hearings and conducting discovery into infringement and invalidity. As a result, I am familiar with the subject matter at issue in this proceeding as result, including the prior art on which Petition relies in this request, as well as the issues of claim construction that been briefed in the litigation.

Dated: January 12, 2017

Respectfully Submitted,

By: /s/ Amir Alavi

Amir Alavi

Attorney for Patent Owner

Parthenon Unified Memory

Architecture, LLC

**AHMAD, ZAVITSANOS, ANAIPAKOS,  
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PUMA Exhibit 2008

FILED PUMA 122 2016 01125

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Amir H. Alavi represents plaintiffs and defendants in complex commercial litigation throughout the United States. He has litigated cases involving hedge funds and investment partnerships, intellectual property, securities fraud, mergers, energy trading, software development, natural gas pipelines, oil & gas mineral interests, construction defects, and the automotive industry. Since 2006, he has recovered more than half-a-billion dollars in settlements and verdicts for his clients.

Mr. Alavi is Board Certified in Civil Trial Law by the Texas Board of Legal Specialization, a distinction reserved for Texas trial lawyers with a high degree of trial experience and expertise. He has been recognized by attorneys across the country as one of the Best Lawyers in America for commercial litigation, is AV-rated by Martindale Hubbell and is a Life Fellow of the Texas Bar Foundation. He has been consistently recognized on the Thomson Reuters *Texas Super Lawyers* listing and by *H Texas* magazine as a "Top Lawyer in Houston."

Prior to joining the Firm, Mr. Alavi was the general counsel of a privately-held company with over 5,000 employees. While there, he managed the mergers and acquisition department and handled several acquisitions of public and private companies.

Some of Mr. Alavi's representative cases include:

- *Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd., et al.* – Represented Rembrandt in a patent infringement lawsuit against Samsung involving Bluetooth™ EDR technology. After a one-week trial, a jury returned a verdict in the amount of \$15.75 million for Rembrandt.
- *XimpleWare, Inc. v. Versata Software Inc., et al.* – Represented Versata and its clients in a patent infringement lawsuit, and companion copyright lawsuit, brought by an open source software provider. Secured dismissal of claims against Versata's clients and the case was settled on a confidential basis on the eve of a ruling by the Court on a sanctions motion filed by Versata and its clients.
- *Houston v. Saracen Energy Advisors, L.P., et al.* – Represented a natural gas energy trader in claims for \$30 million in bonus and deferred compensation. The case settled on a confidential basis.
- *Versata Software Inc. et al v. SAP America Inc et al.* – Mr. Alavi was a member of the AZA legal team that Versata/Trilogy hired a few months before the retrial of a significant patent case. AZA was tasked with developing the lost profits claim for Versata/Trilogy. With AZA's help, Versata/Trilogy secured the second largest patent verdict reported to Verdict Search nationwide in 2011 as of May 31. Read about the patent verdict here.

PUMA Exhibit 2008

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