

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,
Patent Owner.

Case IPR2016-01135
Patent 5,812,789

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

PUMA Exhibit 2010

APPLE - PUMA IPR 2016-01135

I, Justin Chen, 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 Justin Chen 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 Eastern District of Texas.
 - b) U.S. District Court for the Southern District of Texas.
 - c) U.S. Court of Appeals for the Federal 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; and IPR2015-01502 in the last three (3) years; and
9. I am an experienced litigation attorney, with experience in numbers of litigations involving patent infringement in District Courts across the country, including Markman hearings in patent infringement litigation. My biography is attached as Exhibit 2010. I am counsel for Parthenon Unified Memory Architecture, LLC 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. 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: February 17, 2017

Respectfully Submitted,

By: /s/ Justin Chen

Justin Chen

Attorney for Patent Owner

Parthenon Unified Memory

Architecture, LLC

PUMA Exhibit 2010

IPR2015-01500-01502

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PUMA Exhibit 2010

APR 15 2010 10:00 AM

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Justin Chen is an intellectual property lawyer who focuses on patent litigation. He has a degree in electrical and computer engineering and has assisted in representing major manufacturers of semiconductors, smartphones, electronic lighting controls, and others. His practice also includes counseling on copyrights and trademarks.

Mr. Chen has litigated cases in district courts across the country as well as the International Trade Commission. He has experience taking depositions, drafting summary judgment motions, conducting pre-suit investigations, and working with expert witnesses. Mr. Chen joined AZA from Vinson & Elkins.

A graduate of University of Pennsylvania Law School, Mr. Chen also has a certificate in business and public policy from the Wharton School. He graduated *cum laude* from Rice University, where he studied electrical and computer engineering. Before attending law school, he was a research assistant at the Rice University Center for Multimedia Communication where he designed and implemented a spectrum analyzer and memory board for the Wireless Open-Access Research Platform (WARP).

Some of Mr. Chen's representative cases include:

- Assisted in the representation of a major semiconductor manufacturer in a declaratory judgment action in the Northern District of California and a patent infringement action in the District of Delaware involving patents related to semiconductor processing, flash memory products, and integrated circuit packaging.
- Assisted in the representation of a leading manufacturer of electronic lighting controls in a patent infringement case in the District of Utah.
- Assisted in the representation of a major smartphone manufacturer in patent litigation in the Eastern District of Texas.

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