UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

Juniper Networks, Inc.,

Petitioners

v.

ChriMar Systems, Inc.,

Patent Owner.

U.S. Patent No. 8,902,760 Case No. IPR2016-01399

DECLARATION OF TALIN GORDNIA IN SUPPORT OF JUNIPER NETWORKS, INC.'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION

Mail Stop: PATENT BOARD Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

Case IPR2016-01399 Patent No. 8,902,760

I, Talin Gordnia, declare as follows:

- 1. I am an attorney licensed to practice law in the state of California.
- I am a member in good standing of the Bar of the State of California.
 I am also admitted to practice before the United States District Courts in the Central and Northern Districts of California.
- 3. I am a member in good standing in all jurisdictions where I have been admitted to practice.
- 4. I have never been suspended or disbarred from practice before any court or administrative body.
- I have never had an application denied for admission to practice before any court or administrative body.
- I have never had any sanctions or contempt citations imposed by any court or administrative body.
- 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 C.F.R.
- 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).

- 9. I am seeking *pro hac vice* admission in co-pending matters IPR2016-01389, IPR2017-01391, and IPR2016-01397. I am also currently seeking *pro hac vice* admission in unrelated matters IPR2017-00607, IPR2017-00608, IPR2017-00617, IPR2017-00619, IPR2017-00620, IPR2017-00621 and IPR2017-00623.
- I have appeared *pro hac vice* before the Patent Trial and Appeal Board in connection with IPR Nos. IPR2015-01764, IPR2015-01767, and IPR2015-01768.
- 11. I am an Associate at the law firm of Irell & Manella LLP. I have been litigating cases relating to patents for over six (6) years, including cases involving co-pending proceedings in the United States Patent and Trademark Office.
- 12. I have an established familiarity with the subject matter at issue in these proceedings. U.S. Patent No. 8,902,760 ("the '760 patent") is assigned to ChriMar Systems, Inc., and is at issue in a co-pending patent infringement litigation involving Petitioner Juniper Networks, Inc., *Chrimar Systems Inc., et al. v. Juniper Networks, Inc.*, Case No 3:16-cv-00558-SI (N.D. Cal.). I am counsel for the Petitioner Juniper U.S.A., Inc., in this litigation. I have engaged closely in issues related to the '760 patent, including discovery, in the underlying litigation.

As a result, I have acquired substantial understanding of the

underlying legal and factual issues at stake in these proceedings.

I hereby 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 so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of U.S. Patent No. 8,902,760.

Date: February 17, 2017

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<u>/Talin Gordnia/</u> Talin Gordnia

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