

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

TQ DELTA, LLC,
Patent Owner.

Case IPR2016-01760
Patent No. 9,094,268

**DECLARATION OF RAJENDRA A. CHIPLUNKAR IN
SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

I, Rajendra A. Chiplunkar, declare as follows:

1. I am an associate with the law firm of McAndrews, Held and Malloy, Ltd. in Chicago, Illinois.

2. I have been practicing law for more than three years. My practice during this time has focused on intellectual property litigation, and particularly, patent litigation.

3. I am a member in good standing of the Bar of the State of Illinois and am admitted to practice in the U.S. District Court for the Northern District of Illinois.

4. I have been admitted to practice *pro hac vice* in other Federal District courts.

5. I was the Vice-President of the Illinois State Bar Association Intellectual Property Council and am a current member of the Illinois State Bar Association Intellectual Property Council.

6. I have experience in fact and expert document and deposition discovery, and motion practice before U.S. District Courts in connection with patent infringement litigation matters.

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

9. No court or administrative body has ever denied my application for admission to practice.

10. No court or administrative body has ever sanctioned me or cited me for contempt.

11. 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 37 C.F.R. Section 42.

12. I agree to be subject to the United States Patent and Trademark Office's 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).

13. I have spent substantial time reviewing and analyzing the patent at issue in this proceeding, the patent file history, the Petition, the references cited, and the Declarations of Petitioner's Expert and, therefore, am familiar with the subject matter at issue in this proceeding.

14. A motion for my admission to appear *pro hac vice* before the Patent Trial and Appeal Board (the "Board") was filed in IPR2014-01195 and the Board granted said motion. *See* IPR2014-01195, Paper 35 (Sept. 8, 2015). Motions were also filed in IPR2016-01469 (granted at Paper 21, April 25, 2017); IPR2016-01470 (granted at Paper 22, April 25, 2017); IPR2016-01006 (granted at Paper 28, July 5, 2017); IPR2016-01007 (granted at Paper 26, July 5, 2017); IPR2016-01008

(granted at Paper 28, July 5, 2017); IPR2016-01009 (granted at Paper 25, July 5, 2017) , and IPR2016-01160 (granted at Paper 28, August 8, 2017).

I declare under penalty of perjury, under the laws of the United States of America, that the forgoing is true and correct.

Respectfully submitted,

Dated: September 8, 2017

/s/ Rajendra A. Chiplunkar
Rajendra A. Chiplunkar
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