

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REACTIVE SURFACES LTD. LLP,

Petitioner,

v.

TOYOTA MOTOR CORPORATION,

Patent Owner.

Case IPR2016-01914

Patent No. 8,394,618 B2

**DECLARATION IN SUPPORT OF PATENT OWNER'S MOTION
FOR *PRO HAC VICE* ADMISSION OF JOHN D. LUKEN
PURSUANT TO 37 C.F.R. § 42.10**

TOYOTA EXHIBIT 2001
Reactive Surfaces Ltd. LLP v. Toyota Motor Corporation
IPR2016-01914

I, John D. Luken, declare as follows:

1. I am more than twenty one (21) years of age, am competent to present this declaration, and have personal knowledge of the facts set forth below.

2. This declaration is given in support of Patent Owner's Motion for *Pro Hac Vice* Admission.

3. I am a partner at the law firm of Dinsmore & Shohl LLP in the Cincinnati office.

4. I have been practicing patent litigation since 2000. I have been involved in numerous cases involving patent validity and infringement in federal district courts across the country. I have significant trial experience in patent and non-patent cases and have argued multiple appeals before the United States Court of Appeals for the Federal Circuit.

5. I am a member in good standing of the State Bar of Ohio.

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

7. No court or administrative body has ever denied my application for admission to practice before it.

8. No court or administrative body has ever imposed sanctions or contempt citations on me.

9. 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.

10. I understand that I will be subject to the 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).

11. In the last three (3) years, I have applied to appear *pro hac vice* in the following proceedings before the Office: IPR2015-01128, IPR2015-01129, IPR2015-01131, and IPR2016-01462. My application was granted in each proceeding.

12. I have studied the subject patent, the Petition, and the accompanying exhibits, including the prior art references relied upon by Petitioner. In addition, I have engaged in extensive strategic and substantive discussions regarding this proceeding with Patent Owner's lead and back-up counsel.

13. Therefore, I have an established familiarity with the subject matter at issue in this *inter partes* review.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2017



John D. Luken