

By: Justin J. Lesko (justinlesko@patentit.com)  
Reg. No. 69,643

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

INTEL CORPORATION, GLOBALFOUNDRIES U.S., INC.,  
MICRON TECHNOLOGY, INC., AND  
SAMSUNG ELECTRONICS COMPANY, LTD.,

Petitioners

v.

DANIEL L. FLAMM,

Patent Owner

CASE IPR2017-0281<sup>1</sup>  
U.S. Patent No. RE40,264 E

**PATENT OWNER'S MOTION TO ENTER  
CURRICULUM VITAE OF DANIEL L. FLAMM, SC.D**

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

---

<sup>1</sup> Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01751

## **I. Relief Requested**

With the Board's authorization for this motion by email dated March 2, 2018, Patent Owner Daniel L. Flamm, by its attorney, respectfully requests that the Board enter the attached *curriculum vitae* (C.V.) of Daniel L. Flamm, Sc.D (Exhibit 2003) in this proceeding.

## **II. Statement of Facts Showing Good Cause for the Board to Enter the Curriculum Vitae**

Patent Owner timely filed a Declaration of Daniel L. Flamm, Sc.D (Exhibit 2001) with its Patent Owner's Response in this matter on September 20, 2017.

The Declaration describes Dr. Flamm's background and qualifications at Paragraphs 1-5.

Paragraph 1 of the declaration refers to Dr. Flamm's *curriculum vitae* "attached as Appendix A."

It recently came to the attention of Patent Owner's counsel that Dr. Flamm's C.V. was inadvertently not attached to the declarations at the time the declaration was filed.

Dr. Flamm's C.V. was previously filed in IPR2016-01512 on May 1, 2017 as Exhibit 2001 to Paper No. 9. IPR2016-01512 also involved Reissue Patent No. RE40,264 challenged herein, and Samsung was the Petitioner in that proceeding. Dr. Flamm's C.V. was also filed IPR2015-01767 involving U.S. Patent No.

6,017,221 on May 16, 2016 as Exhibit 2001 to Paper No. 15. The Petitioners are also challenging the '221 Patent in a currently pending *inter partes* review proceeding (IPR2017-00391).

Accordingly, in the interest of justice and to assist the Board with its consideration of this matter, Patent Owner respectfully requests that the Board enter the attached C.V. of Daniel L. Flamm, Sc.D (Exhibit 2003). The C.V. simply provides further details of Dr. Flamm's background and qualifications that were described in the declaration already of record, and Patent Owner clearly intended to include the C.V. with the declaration. It is important for the Board to have the C.V. in order to adequately weigh the testimony of Dr. Flamm.

Entering the C.V. will not prejudice the Petitioners, as it does not affect the substantive arguments already set forth in the briefs, and it does not introduce any new evidence. Some or all of the Petitioners have already seen the publicly available C.V. of Dr. Flamm in other *inter partes* review proceedings, as discussed above.

Petitioners do not oppose this motion to enter the *curriculum vitae* of Dr. Flamm.

### III. Conclusion

Patent Owner respectfully requests that the Board grant its motion and enter herein the attached C.V. of Daniel L. Flamm, Sc.D (Exhibit 2003).

Respectfully Submitted,

Date: March 6, 2018

By: /Justin J. Lesko, reg. no. 69,643/  
Justin J. Lesko, reg. no. 69,643

Law Offices of Steve G. Lisa, Ltd.  
7689 E Paradise Lane, Suite 2  
Scottsdale, AZ 85260  
Email: [justinlesko@patentit.com](mailto:justinlesko@patentit.com)

*Counsel for Daniel L. Flamm*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **PATENT OWNER'S MOTION TO ENTERCURRICULUM VITAE OF DANIEL L. FLAMM, SC.D** was served by electronic mail on this day, March 6, 2018, on the following individuals:

Jonathan McFarland  
[JMcfarland@perkinscoie.com](mailto:JMcfarland@perkinscoie.com)  
PERKINS COIE LLP  
1201 Third Ave., Suite 4900  
Seattle, WA 98101  
(206) 359-8000

David M. Tennant  
[dtennant@whitecase.com](mailto:dtennant@whitecase.com)  
WHITE & CASE LLP  
701 Thirteenth St., NW  
Washington, DC 20005  
(202) 626-3600

Daniel Keese  
[DKeese@perkinscoie.com](mailto:DKeese@perkinscoie.com)  
PERKINS COIE LLP  
1120 NW Couch St., 10<sup>th</sup> Floor  
Portland, OR 97209  
(503) 727-2000

Nathan Zhang  
[nathan.zhang@whitecase.com](mailto:nathan.zhang@whitecase.com)  
WHITE & CASE LLP  
3000 El Camino Real  
5 Palo Alto Square, 9<sup>th</sup> Floor  
Palo Alto, CA 94306  
(650) 213-0300

Chad S. Campbell  
[CSCampbell@perkinscoie.com](mailto:CSCampbell@perkinscoie.com)  
Tyler Bowen  
[TBowen@perkinscoie.com](mailto:TBowen@perkinscoie.com)  
PERKINS COIE LLP  
2901 North Central Ave., Suite 2000  
Phoenix, AZ 85012  
(602) 351-8000

[WCGlobalFoundries-  
FlammTeam@whitecase.com](mailto:WCGlobalFoundries-FlammTeam@whitecase.com)

*Counsel for GLOBALFOUNDRIES  
U.S., Inc.*

[Intel-Flamm-Service-  
IPR@perkinscoie.com](mailto:Intel-Flamm-Service-IPR@perkinscoie.com)

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.