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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 IPR2017-0282¹
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
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P.O. Box 1450
Alexandria, VA 22313-1450

¹ Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01752

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 declaration 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/
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CERTIFICATE OF SERVICE

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

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