

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.  
*Petitioner*

v.

IMAGE PROCESSING TECHNOLOGIES, LLC,  
*Patent Owner*

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Case IPR2017-00357  
Patent 8,989,445B2

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**DECLARATION OF ROSE CORDERO PREY IN SUPPORT OF  
PATENT OWNER'S MOTION FOR PRO HAC VICE  
ADMISSION UNDER 37 C.F.R. §42.10(c)**

Exhibit 2003  
IPR2017-00357

Petitioner - Samsung Electronics Co., Ltd., et al.

I, Rose Cordero Prey, declare as follows:

1. I am more than twenty-one years of age, am competent to present this declaration, and have personal knowledge of the facts set forth herein.
2. This declaration is given in support of Image Processing Technologies, LLC's Motion for *Pro Hac Vice* Admission of Rose Cordero Prey under 37 C.F.R. § 42.10(c).
3. I am a partner at the law firm of Andrews Kurth Kenyon LLP.
4. If admitted *pro hac vice* in this matter, I will serve as counsel with Chris Coulson, also of the law firm Andrews Kurth Kenyon. Mr. Coulson is lead counsel on this case and is registered to practice in this Court.
5. I am an experienced litigation attorney and have been litigating patent cases for over 10 years. I have experience litigating patent infringement cases in many district courts and before the U.S. International Trade Commission. I have been counsel at trial, hearings, and with respect to patent-related summary judgment proceedings and other patent-related hearings and pleadings concerning, *inter alia*, patent validity, claim construction, and infringement issues. I have also been counsel in three *Inter Partes* Review proceedings.
6. I received a Bachelor's of Science degree in Mathematics with a minor in Physics in 2001.

7. I am trial counsel for Patent Owner and have been actively involved in all aspects of the Eastern District of Texas court proceeding against Petitioner involving the same patents and technology (*Image Processing Technologies, LLC v. Samsung Electronics Co., Ltd., et al.*, 2:16-cv-00505-JRG). Consequently I have gained in-depth familiarity with the subject matter at issue in this proceeding.
8. I have stayed up-to-date regarding the documents filed and actions taken to date in the present matter (Case IPR2017-00357), and have carefully reviewed it.
9. I am a member in good standing of the State Bar of New York, as well as the following Federal Courts:
  - United States District Court for the Eastern District of New York;
  - United States District Court for the Southern District of New York;
  - United States District Court for the Eastern District of Texas; and
  - United States Court of Appeals for the Federal Circuit.
10. I have never been suspended or disbarred from practice before any court or administrative body.
11. I have never made an application for admission to practice before any court or administrative body that has been denied.

12. No sanctions or contempt citations have been imposed against me by any court or administrative body.
13. 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 Title 37 of the Code of Federal Regulations.
14. I understand that I will be subject to the USPTO Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 *et. seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
15. I have applied to appear *pro hac vice* in three proceedings before the United States Patent and Trademark Office in the last three (3) years, *Micron Technology, Inc. and Micron Memory Japan, Inc. v. Massachusetts Institute of Technology*, IPR2015-01087; *Apple Inc., v. Limestone memory Systems LLC*, IPR2016-01561; and *Apple Inc. v. Limestone Memory Systems LLC*, IPR2016-01567.
16. Motions for *Pro Hac Vice* Admission of Ms. Prey are being concurrently filed in the following related *Inter Partes* Review proceedings:
  - i. IPR2017-00347
  - ii. IPR2017-00353
  - iii. IPR2017-00355
  - iv. IPR2017-00336

17. I 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 were 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.

Executed on April 14, 2017



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Rose Cordero Prey