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Reg. No. 69,643

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

DANIEL L. FLAMM,

Patent Owner

CASE IPR2017-0391<sup>1</sup>  
U.S. Patent No. 6,017,221

**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

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<sup>1</sup> Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01746

## **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 2007) 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 Preliminary Response in this matter on March 14, 2017.

Patent Owner timely filed a Second Declaration of Daniel L. Flamm, Sc.D (Exhibit 2003) with its Patent Owner Response in this matter on September 6, 2017.

The Declarations describe Dr. Flamm's background and qualifications at Paragraphs 1-5.

Paragraph 1 of each 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 these declarations at the time the declarations were filed.

Dr. Flamm's C.V. was previously filed in IPR2015-01767 involving the same patent at issue herein (U.S. Patent No. 6,017,221) on May 16, 2016 as Exhibit 2001 to Paper No. 15. It was also filed in IPR2016-01512 on May 1, 2017 as Exhibit 2001 to Paper No. 9. Petitioner Samsung was also the Petitioner in IPR2016-01512, involving Reissue Patent No. RE40,264, and the other Petitioners herein are challenging RE40,264 in other currently pending *inter partes* review proceedings.

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 2007). The C.V. simply provides further details of Dr. Flamm's background and qualifications that were described in the declarations already of record, and Patent Owner clearly intended to include the C.V. with the declarations. 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 2007).

Respectfully Submitted,

Date: March 6, 2018

By: /Justin J. Lesko, reg. no. 69,643/  
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*Counsel for Daniel L. Flamm*

**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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