

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICRON TECHNOLOGY, INC.,  
INTEL CORPORATION, AND  
GLOBALFOUNDRIES U.S., INC.,

Petitioners

v.

DANIEL L. FLAMM,

Patent Owner

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Case IPR No. 2017-00406  
U.S. Patent No. 5,711,849  
Issued: January 27, 1998  
Named Inventor: Daniel L. Flamm

Title: PROCESS OPTIMIZATION IN GAS PHASE DRY ETCHING

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**AFFADAVIT OF JARED BOBROW IN SUPPORT OF PETITIONER'S  
MOTION FOR ADMISSION *PRO HAC VICE***

I, Jared Bobrow, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the State Bar of California. I was admitted to the California State Bar on June 16, 1988. My California Bar membership number is 133712. I am admitted to practice before the District Courts of the Northern, Central, Southern and Eastern Districts of California, and the Eastern District of Texas. I am also admitted to practice before the California State Supreme Court, U.S. Court of Appeals for the Federal Circuit, Ninth Circuit, and First Circuit. For over 25 years, my practice has been focused on the field of intellectual property, particularly patent litigation.

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

3. I have never had a court or administrative body deny my application for admission to practice.

4. I have never had any sanctions or contempt citations imposed on me by any court or administrative body.

5. 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 37 C.F.R.

6. I agree to be subject to the United States Patent and Trademark Office 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).

7. I have applied to appear *pro hac vice* before this office in the following proceedings in the past three years: CBM2014-00091, CBM2014-00092, and CBM2014-00093. I was admitted to practice in these proceedings as back-up counsel on March 10, 2015, subject to filing a supplemental declaration, which filing occurred on March 19, 2015. I have also applied to appear *pro hac vice* before this office in the following proceeding in the past three years: IPR2015-00657, IPR2015-00658, IPR2015-00660, IPR2015-00662, and IPR2015-00666. I was admitted to practice in these proceedings as back-up counsel only on May 29, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2014-01197, IRP2014-01207, and IPR2014-01209. I was admitted to practice in these proceedings as back-up counsel on September 16, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2016-00320, IPR2016-00322, IPR2016-00323, IPR2016-00330. I was admitted to practice in these proceedings as back-up counsel on September 26, 2016. I have also applied to appear *pro hac vice* before this office in the following proceeding in the past three years: IPR2016-00782. The application was filed on October 3, 2016 and is

pending before this office. I am also concurrently applying to appear *pro hac vice* before this office in the following proceedings: IPR2017-00279, IPR2017-00280, IPR2017-00281, IPR2017-00282, IPR2017-00391, and IPR2017-00392.

8. I am an experienced litigation attorney, with particular experience in patent infringement litigations in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, trials, and hearings.

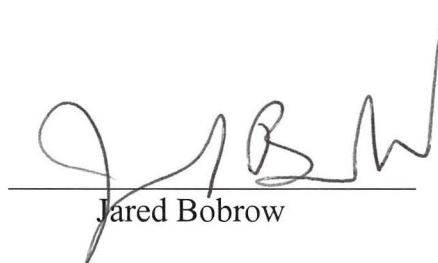
9. I am counsel for Micron Technology, Inc. (“Micron”), a Petitioner and the defendant in a related pending litigation in the United States District Court for the District of Delaware, in which U.S. Patent Nos. 5,711,849, 6,017,221, and RE40,264 are asserted by the Patent Owner (*Daniel L. Flamm v Micron Technology, Inc.*, Case No. 5:16-cv-01581-BLF (N.D. Cal.)). I am familiar with the subject matter at issue in this proceeding as a result of my representation of Micron in the related litigation, including the prior art that Petitioner presents in this proceeding. I am familiar with the invalidity defenses raised in the related litigation and have reviewed and am familiar with prior art raised in this proceeding, including Alkire et al., Transient Behavior during Film Removal in Diffusion-Controlled Plasma Etching, J. Electrochem. Soc., Solid-State Science and Technology, March 1985, pp. 648-656 (“Alkire”) (Ex.1005); and Galewski et al., Modeling of a High Throughput Hot-Wall Reactor for Selective Epitaxial

Growth of Silicon, IEEE Transactions On Semiconductor Manufacturing, Vol. 5 No. 3, August 1991, pp. 169-179 ("Galewski") (Ex.1007). I have reviewed the briefs and papers filed in this proceeding and in *inter partes* review proceedings involving related patents.

I declare that all statements made herein of my own knowledge are true and correct.

Respectfully submitted,

Dated: January 20, 2017



Jared Bobrow