

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION and HTC AMERICA, INC.,
Petitioners,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,
Patent Owner.

Case IPR No.: IPR2017-00512
Patent 5,812,789

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

PUMA Exhibit 2001

I, Amir Alavi, being duly sworn and upon oath, hereby attest to the following:

1. I am an attorney with the AZA law firm and represent the Patent Owner Parthenon Unified Memory Architecture LLC (“PUMA”) in the above captioned proceeding. I am submitting this declaration in support of Patent Owner’s Unopposed Motion for *Pro Hac Vice* Admission of Amir Alavi Under 37 C.F.R. § 42.10(c).
2. I am a member in good standing of the Bar of Texas, as well as the following Federal Courts:
 - a) U.S. District Court for the Northern District of Texas;
 - b) U.S. District Court for the Southern District of Texas;
 - c) U.S. District Court for the Western District of Texas;
 - d) U.S. District Court for the Eastern District of Texas; and
 - e) U.S. Court of Appeals for the Fifth Circuit.
3. I have not been suspended or disbarred from practice before any court or administrative body;
4. I have never had an application for admission to practice before any court or administrative body denied;
5. I have never been subject to any sanction or contempt citation imposed by any court or administrative body.

6. 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.
7. I agree to be subject to the USPTO 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).
8. I have applied to appear *pro hac vice* before the Office in IPR2015-01500; IPR2015-01501; IPR2015-01502; IPR2016-00923; IPR2016-00924; IPR2016-01114; IPR2016-01118; IPR2016-01121; IPR2016-01134; and IPR2016-01135 in the last three (3) years; and
9. I am an experienced litigation attorney, with experience in a significant number of District Court litigation involving patent infringement, including jury trials and Markman hearings. My biography is attached as Exhibit 2001. I am lead counsel for Parthenon Unified Memory Architecture in a co-pending litigation in which U.S. Patent No. 5,812,789 is asserted against HTC Corporation, HTC America, Inc., and Apple Inc. In those cases I have been directly involved in all aspects of the case, including arguing two Markman hearings and conducting discovery into infringement and invalidity. As a result, I am familiar with the subject matter at issue in this proceeding as result, including the prior art on which Petition relies in this

request, as well as the issues of claim construction that been briefed in the litigation.

Dated: March 1, 2017

Respectfully Submitted,

By: /s/ Amir Alavi

Amir Alavi
Attorney for Patent Owner
Parthenon Unified Memory
Architecture, LLC

**AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING, P.C.**
1221 McKinney Street, Suite 2500
Houston, TX 77010
Telephone: 713-655-1101

PUMA Exhibit 2001

Amir H. Alavi
AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI & MENSING P.C.
1221 McKinney St., Ste. 2500
Houston, Texas 77010
aalavi@azalaw.com
(713) 655-1101; Fax (713) 655-0062

Amir H. Alavi represents plaintiffs and defendants in complex commercial litigation throughout the United States. He has litigated cases involving hedge funds and investment partnerships, intellectual property, securities fraud, mergers, energy trading, software development, natural gas pipelines, oil & gas mineral interests, construction defects, and the automotive industry. Since 2006, he has recovered more than half-a-billion dollars in settlements and verdicts for his clients.

Mr. Alavi is Board Certified in Civil Trial Law by the Texas Board of Legal Specialization, a distinction reserved for Texas trial lawyers with a high degree of trial experience and expertise. He has been recognized by attorneys across the country as one of the Best Lawyers in America for commercial litigation, is AV-rated by Martindale Hubbell and is a Life Fellow of the Texas Bar Foundation. He has been consistently recognized on the Thomson Reuters *Texas Super Lawyers* listing and by *H Texas* magazine as a "Top Lawyer in Houston."

Prior to joining the Firm, Mr. Alavi was the general counsel of a privately-held company with over 5,000 employees. While there, he managed the mergers and acquisition department and handled several acquisitions of public and private companies.

Some of Mr. Alavi's representative cases include:

- *Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd., et al.* – Represented Rembrandt in a patent infringement lawsuit against Samsung involving Bluetooth™ EDR technology. After a one-week trial, a jury returned a verdict in the amount of \$15.75 million for Rembrandt.
- *XimpleWare, Inc. v. Versata Software Inc., et al.* – Represented Versata and its clients in a patent infringement lawsuit, and companion copyright lawsuit, brought by an open source software provider. Secured dismissal of claims against Versata's clients and the case was settled on a confidential basis on the eve of a ruling by the Court on a sanctions motion filed by Versata and its clients.
- *Houston v. Saracen Energy Advisors, L.P., et al.* – Represented a natural gas energy trader in claims for \$30 million in bonus and deferred compensation. The case settled on a confidential basis.
- *Versata Software Inc. et al v. SAP America Inc et al.* – Mr. Alavi was a member of the AZA legal team that Versata/Trilogy hired a few months before the retrial of a significant patent case. AZA was tasked with developing the lost profits claim for Versata/Trilogy. With AZA's help, Versata/Trilogy secured the second largest patent verdict reported to Verdict Search nationwide in 2011 as of May 31. Read about the patent verdict here.

PUMA Exhibit 2001

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.