

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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JUNIPER NETWORKS, INC., BROCADE COMMUNICATION SYSTEM,  
INC., AND RUCKUS WIRELESS, INC.

Petitioners,

v.

MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC,  
Patent Owner

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Case IPR2017-00640

Patent 5,659,891

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**DECLARATION OF REBECCA CARSON IN SUPPORT OF  
JUNIPER NETWORKS, INC.'S  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION**

***Mail Stop "PATENT BOARD"***

Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

I, Rebecca Carson, declare the following under penalty of perjury:

1. I am an attorney licensed to practice law in the state of California. I am a partner in the law firm of Irell & Manella LLP in its Newport Beach, California office.

2. I make this declaration in support of an application to be admitted *pro hac vice* as counsel for Petitioner Juniper Networks, Inc. in the above-captioned matter.

3. I am a member in good standing of the bar of the State of California. I am also admitted to practice before the United States District Court in the Central and Northern Districts of California, and the United States Court of Appeals for the Ninth and Federal Circuits.

4. I have not been suspended or disbarred from practice before any court or administrative body.

5. I have never had an application denied for admission to practice before any court or administrative body.

6. I have not had any sanctions or contempt citations imposed by any court or administrative body.

7. 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 the C.F.R.

8. I have read and 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 the Board's disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. I have appeared *pro hac vice* before the Patent Trial and Appeal Board in connection with IPR Nos. IPR2014-00425 and IPR2014-00431. I have not applied to appear *pro hac vice* in any other proceedings before the United States Patent and Trademark Office in the last three years.<sup>1</sup>

10. I have an established familiarity with the subject matter at issue in this proceeding. U.S. Patent No. 5,659,891 ("the '891 patent") is currently asserted by Patent Owner Mobile Telecommunication Technologies, Ltd. against Juniper in a co-pending litigation (see Ex. 1016). Ms. Carson is currently counsel for Juniper in the co-pending litigation and is deeply involved with issues relating to the '891 patent. This gives Ms. Carson a substantial and established understanding of the underlying legal and technological issues at stake in this proceeding. Juniper has expended significant time and resources with Ms. Carson as counsel in the co-pending litigation, and wishes to continue using her as counsel in this proceeding.

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<sup>1</sup> Ms. Carson is concurrently applying for *pro hac vice* admission in IPR2017-00642.

Case IPR2017-00640

Patent 5,659,891

Signed under the penalty of perjury this 8<sup>th</sup> day of June 2017.

**Rebecca L. Carson**

Rebecca L. Carson

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*ATTORNEYS FOR PETITIONER*