

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KAWASAKI RAIL CAR, INC.,

Petitioner,

v.

SCOTT BLAIR,

Patent Owner

Case IPR2017-01036

Patent 6,700,602

**DECLARATION OF DARIUSH KEYHANI IN SUPPORT OF PATENT OWNER'S
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to 37 C.F.R. § 42.10(c), I, Dariush Keyhani, do hereby apply for *pro hac vice* admission to appear before the USPTO Patent Trial and Appeal Board on behalf of Patent Owner Scott Blair in the above-titled action.

In support of this application, I certify the following under oath:

1. I am a member of the law firm of Meredith & Keyhani, PLLC. My name, office address, and telephone number are as follows:

Dariush Keyhani
Meredith & Keyhani, PLLC
125 Park Avenue, 25th Floor
New York, New York 10017
Tel. (212) 760-0098

2. I have been admitted to the following courts and bars:

Supreme Court of New Jersey (12/28/2002) (NJ Bar No. 0440622002)
District of Columbia (4/11/2016)(D.C. Bar No. 1031500)
United States District Court for New Jersey (2/3/2003)
United States District Court for the Southern District of New York (1/20/2004)
United States District Court for the Eastern District of New York (1/20/2004)
United States District Court for the Western District of New York (10/22/2004)
Second Circuit Court of Appeals (3/28/2012)
Federal Circuit Court of Appeals (8/7/2013)

3. I am an experienced patent litigation and trial attorney. I have practiced patent litigation for almost 15 years. During this period, I have served as lead litigation and trial counsel in over two dozen patent infringement. In almost all of these cases the validity of the patents was the subject of a claim and/or an affirmative defense.

4. I am the lead litigation and trial counsel representing Scott Blair in parallel proceedings in federal district court for infringement U.S. Patent No. 6,700,602 ('602 Patent, "Subway TV Media System") and also defending the validity of the claims in connection with claims of invalidity brought by Kawasaki Rail Car, Inc. For over one and a half years, I have been preparing and prosecuting this case and have been in charge of overseeing all substantive issues

relating to infringement and validity of the patent. During this time, I have worked closely with the inventor to learn his invention disclosed in the '602 Patent and I have carefully studied the specification and claims of the '602 Patent. I have also carefully reviewed in detail all filings by the Petitioner and Patent Owner in connection with this IPR. I have also worked with two separate technical experts in understanding and learning the invention disclosed and claimed in the '602 Patent. Additionally, I have worked closely and extensively with patent co-counsel Jennifer Meredith, who is also an engineer.

5. I am regularly admitted *pro hac vice* in federal courts throughout the United States.

6. I am currently in good standing with all states, courts, and bars in which I am admitted.

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

8. None of my applications for admission to practice before any court or administrative body has ever been denied.

9. No sanctions or contempt citations have ever been imposed against me by any court or administrative body.

10. 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.

11. I understand that I will be subject to the Office's 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) (Id. ¶ 9).

12. I have never applied for *pro hac vice* admission before the Board. I am applying for *pro hac vice* at the same time as the within application in a related matter (IPR Case IPR2017-00117).

13. Lead counsel with whom I am associated in this matter is Jennifer Meredith, a registered practitioner (Reg. No. 47,790). She is an active member in good standing with the New York and Texas State Bars and is admitted before the United States Patent and Trademark Office, Southern District of New York, Eastern District of New York, Northern District of New York, and Western District of New York. Her office is located at 205 Main Street East Aurora, NY 14052. Her office phone number is (212) 760-0098.

I declare under penalty of perjury that the foregoing is true and correct. Executed in East Aurora, New York, this 3rd day of November 2017. Dated this this 3rd day of November 2017.

Respectfully submitted,

/s/ Dariush Keyhani

Dariush Keyhani (DK-9673)
Meredith & Keyhani, PLLC
125 Park Avenue, 25th Floor
New York, New York 10017
Tel. (212) 760-0098
Fax (212) 202-3819
dkeyhani@meredithkeyhani.com