

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORP. and CAVIUM, INC.,
Petitioner

v.

ALACRITECH, INC.
Patent Owner

Case Nos.

IPR2017-01391 (U.S. Patent No. 7,237,036)¹
IPR2017-01392 (U.S. Patent No. 7,337,241)
IPR2017-01393 (U.S. Patent No. 9,055,104)
IPR2017-01405 (U.S. Patent No. 7,124,205)
IPR2017-01406 (U.S. Patent No. 7,673,072)
IPR2017-01409 (U.S. Patent No. 8,131,880)
IPR2017-01410 (U.S. Patent No. 8,131,880)

**DECLARATION OF GARLAND STEPHENS IN SUPPORT OF
PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION FOR
ADDITIONAL DISCOVERY REGARDING REAL PARTIES-IN-
INTEREST**

¹ Cavium, Inc., which filed Petitions in Cases: IPR2017-01707, IPR2017-01714, IPR2017-01718, IPR2017-01728, IPR2017-01735, IPR2017-01736, IPR2017-01737, has been joined as a petitioner in the listed proceedings.

I, Garland Stephens, declare:

1. I am an attorney with the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for Intel Corporation (“Intel”).

2. I have personal knowledge of the matters set forth in this declaration. If called as a witness, I could and would competently testify as to these matters.

3. I am lead counsel on the following *inter partes* review petitions: IPR2017-01391, IPR2017-01392, IPR2017-01393, IPR2017-01405, IPR2017-01406, IPR2017-01409, and IPR2017-01410 (“Petitions”).

4. I was directed to prepare and file these Petitions solely by in-house counsel at Intel.

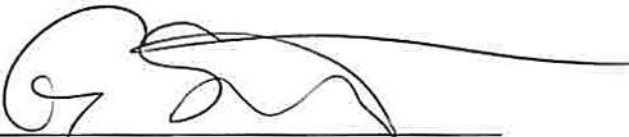
5. I supervised the team that prepared these Petitions. I personally reviewed, edited, signed and authorized the filing of each of the Petitions. The only persons who provided any substantive input into, or exercised any control over, these Petitions were attorneys and staff at Weil, Petitioner Intel’s experts, and Petitioner Intel’s in-house counsel. No substantive input was solicited or accepted from any other person or entity. No drafts were shared with any other person or entity prior to the filing of the Petitions. No other person or entity provided any direction or exercised any control over the substance or timing of the filing of the Petitions

6. Weil did not share the substance of the Petitions before the Petitions were filed with any other person or entity other than those listed in Paragraph 5, including Dell, Inc., Wistron Corporation, Wiwynn Corporation, SMS InfoComm Corporation, CenturyLink Communications LLC, Tier 3, Inc., and Savvis Communications Corp. (the “Defendants”) and Intervenor Cavium, Inc. (“Cavium”). Defendants and Cavium, including their counsel, played no role in preparing or filing of the Petitions and were not provided any drafts of the Petitions or the Petitions themselves until after the Petitions were filed.

7. Intel is solely responsible for the fees and costs Weil has incurred in filing the Petitions. No other person or entity has paid or agreed to pay Weil for any fees or costs for the Petitions.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information or belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 or Title 18 of the United States Code and that such willful false statements may jeopardize the results of these proceedings.

January 10, 2018



Garland Stephens

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, a copy of **DECLARATION OF GARLAND STEPHENS IN SUPPORT OF PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION FOR ADDITIONAL DISCOVERY REGARDING REAL PARTIES-IN-INTEREST** was served by filing this document through the PTAB's E2E Filing System as well as delivering a copy via electronic mail upon the following:

James M. Glass
Registration No. 46,729
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Ave., 22nd Fl.
New York, NY 10010
Tel.: (212) 849-7000
Email: jimglass@quinnemanuel.com

Joseph M. Paunovich
Registration No. 59,033
Quinn Emanuel Urquhart & Sullivan LLP
865 S. Figueroa Street, 10th Fl.
Los Angeles, CA 90017
Tel.: (213) 443-3000
Email: joepaunovich@quinnemanuel.com

Brian E. Mack
Registration No. 57,189
Quinn Emanuel Urquhart & Sullivan LLP
50 California Street, 22nd Fl.
San Francisco, CA 94111
Tel.: (415) 875-6600
Email: brianmack@quinnemanuel.com

Mark Lauer
Registration No. 36,578
Silicon Edge Law Group LLP
7901 Stoneridge Dr., Ste. 528
Pleasanton, CA 94588
Tel.: (925) 621-2121
Email: mark@siliconedgelaw.com

Dated: January 10, 2018

/s/ Garland T. Stephens

Garland T. Stephens

Reg. No. 37,242