

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.,  
Petitioner

v.

PLECTRUM LLC  
Patent Owner

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Case: IPR2017-01430  
Patent 5,978,951

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**AFFIDAVIT OF C. RYAN PINCKNEY  
IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

1. I, C. Ryan Pinckney, am more than twenty-one years of age, am competent to present this affidavit, and have personal knowledge of the facts below.

2. This affidavit supports Plectrum's motion for *pro hac vice* admission.

3. I hold the position of counsel at the law firm Antonelli, Harrington, & Thompson LLP.

4. I have been a litigating attorney for more than eleven years. I have been litigating patent cases for more than eleven years.

5. I am a member in good standing in the bar of Texas and the U.S. District Court for the Eastern District of Texas. I have never been suspended or disbarred from practice before any court or administrative body.

6. No court or administrative body has ever denied my application for admission to practice before it.

7. No court or administrative body has ever imposed sanctions or contempt citations on me.

8. 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 Title 37 of the Code of Federal Regulations.

9. I agree to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction

under 37 C.F.R. § 11.19(a).

10. I have applied to appear pro hac vice in four other proceedings before the Office in the last three (3) years. Specifically, I applied for and was granted admission pro hac vice in four IPR proceedings captioned *St. Jude Medical, LLC v. Snyders Heart Valve LLC*: IPR2018-00105, IPR2018-00106, IPR2018-00107, and IPR2018-00109.

11. In a related matter involving the '951 Patent, I am representing Patent Owner Plectrum in a litigation previously pending in the Eastern District of Texas. See *Plectrum LLC v. AT&T Inc. et al.*, No. 4:17-cv-00120. As a result, I have reviewed the '951 Patent and its relevant file history, and the prior art (including the prior art at issue in this *Inter Partes* Review proceeding). In addition, I have familiarity with the claim construction issues pertaining to the '951 Patent.

12. I have performed a detailed review of the '951 Patent, the parties' submissions in the present *Inter Partes* Review proceeding, and the Board's Decisions instituting *Inter Partes* Review of the '951 Patent. Additionally, I have served an essential role in this *Inter Partes* Review proceeding, including working with the present Lead and Backup Counsel to prepare the Preliminary Response and the Response. Based on the foregoing, I have a detailed understanding of the '951 Patent and the substantive and technical issues involved in this proceeding.

13. I declare that all statements made herein of my own knowledge are

true and that all statements made on information and 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 of Title 18 of the United States Code.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 17, 2018

Respectfully submitted,

/s/ C. Ryan Pinckney

C. Ryan Pinckney, Esq.