

UNITED STATES PATENT AND TRADEMARK OFFICE  
**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SHENZHEN ZHIYI TECHNOLOGY CO. LTD., D/B/A/ ILIFE,  
Petitioner,

v.

IROBOT CORPORATION,  
Patent Owner.

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Case No.: IPR2017-02061  
Patent 6,809,490

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**AFFIDAVIT OF NICHOLAS A. BROWN**  
**IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

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1. I, Nicholas A. Brown, 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 Petitioner's motion for *pro hac vice* admission.

3. I am an associate at the law firm Greenberg Traurig, LLP.

4. I have been a litigating attorney for twenty years. I have been litigating patent cases for twenty years.

5. I am a member in good standing in the bar of California, and am admitted to practice before the several U.S. District Courts, the U.S. Court of Appeals for the Federal Circuit, and the U.S. Court of Appeals for the Ninth Circuit. 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 the C.F.R.

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. In the past three years, I have applied for and been granted *pro hac vice* admission in four proceedings: IPR2015-01983, IPR2015-01984, IPR2015-01985, and IPR2017-02137. Otherwise, I have not applied to appear *pro hac vice* in any other proceedings before the Office in the last three (3) years.

11. I have reviewed the patent-at-issue, the Petition, and the accompanying exhibits. I have been actively involved in litigating the patent-at-issue in the parallel proceedings pending before the International Trade Commission: *In re Certain Robotic Vacuum Cleaning Devices And Components Thereof Such As Spare Parts*, Investigation No. 337-TA-1057, including taking the depositions of inventors and experts and preparing briefing related to the patent-at-issue. I have also reviewed various filings from the underlying litigation including the claim construction briefing and *Markman* Order. Through my experience and analysis of the aforementioned documents, I have acquired substantial understanding of the underlying technological issues at stake in these proceedings.

12. My practice focuses on intellectual property issues, and I have an established familiarity with the legal issues involved in these proceedings based on my eighteen years of experience litigating patents.

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: June 8, 2018

/s/ Nicholas A. Brown  
Nicholas A. Brown, Esq.