

INTEL CORP., CAVIUM, LLC, and DELL INC.,  
Petitioners,

v.

ALACRITECH, INC.,  
Patent Owner.

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Case IPR2018-00234<sup>1</sup>  
U.S. Patent No. 8,805,948

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**DECLARATION OF ALBERT J. HARNOIS, JR. IN SUPPORT OF  
PETITIONER CAVIUM, LLC'S SUPPLEMENTAL BRIEF REGARDING  
35 U.S.C. § 315(b)  
EXHIBIT 1500**

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<sup>1</sup> Cavium, LLC, who filed a Petition in Case IPR2018-00403, and Dell Inc., who filed a Petition in Case IPR2018-01307, have been joined as petitioners in this proceeding.

By submitting this declaration, it is not my intention, nor the intention of Marvell Semiconductor, Inc. (“MSI”) to waive the attorney client privilege, attorney work product doctrine, or any other applicable privilege.

2. I am currently Assistant General Counsel at MSI. Prior to that, I was Senior Intellectual Property at Cavium, Inc. and Cavium, LLC during the relevant time period. I am the MSI in house attorney managing the district court case, *Alacritech, Inc. v Century Link, et al., and Intel Corporation and Cavium, LLC.*, Case No. 2:16-cv-00693(Lead Case) (“the Alacritech Litigation”) and related IPR proceedings (“Alacritech IPR Proceedings.”) When at Cavium, and prior to the acquisition by Marvell, I was also the principal in house attorney managing the Alacritech litigation and related IPR proceedings.


3. Cavium solely made the decision to file IPR2018-00401, IPR2018-00234, and IPR2018-00226 (“Petitions” or “IPR Proceedings”) and only for its own benefit. All attorneys’ fees and costs incurred in preparing and filing the Petitions have been borne by Petitioner Cavium alone.

5. Petitioner Cavium has not received nor agreed to receive any reimbursement, payment, or other value from Dell related to the filing of the Petitions. Dell has independent outside counsel and Cavium is not reimbursing Dell's outside counsel in the Alacritech Proceedings.

6. To the best of my knowledge, the relevant sales agreement concerning indemnification has been produced in the IPR Proceedings, bearing the bates numbers Cavium\_IPR\_401('699 Patent)\_000001-000019.

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.

Dated: February 26, 2019

  
Albert J. Harnois, Jr.

served by filing this document through the PTAB's E2E Filing System as well as delivering a copy via electronic mail upon the following:

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Dated: February 26, 2019

/s/ David T. Xue  
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