

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.

BRADIUM TECHNOLOGIES LLC,  
Patent Owner.

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Case IPR2018-00952  
Patent No. 9,253,239

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**DECLARATION OF MICHAEL N. ZACHARY IN SUPPORT OF  
PATENT OWNER'S *PRO HAC VICE* ADMISSION  
UNDER 37 C.F.R. §42.10(c)**

I, MICHAEL N. ZACHARY, declare as follows:

1. I am a partner at the law firm of Bunsow De Mory LLP, located at 701 El Camino Real, Redwood City, CA 94063, which has been retained by Patent Owner Bradium Technologies LLC in this *inter partes* review.

2. I make this declaration in support of the Patent Owner's application for my admission *pro hac vice*.

3. I am a member in good standing of the state Bars in California, Oregon, and Washington State. I am also duly admitted and authorized to practice law before the U.S. District Court for the Central District of California, U.S. District Court for the Eastern District of California, U.S. District Court for the Northern District of California, U.S. District Court for the Southern District of California, U.S. District Court for the District of Colorado, U.S. District Court for the District of Oregon, U.S. District Court for the Eastern District of Texas, U.S. District Court for the Eastern District of Washington, and U.S. District Court for the Western District of Washington.

4. I have not had any application denied for admission to practice, nor have I been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.

5. If admitted *pro hac vice* in this matter, I will serve as counsel with

Chris J. Coulson, also of the law firm Bunsow De Mory LLP. Mr. Coulson is lead counsel on this case and is registered to practice in this Court.

6. I understand that, upon admission *pro hac vice*, I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. 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.

8. I hereby agree to notify the Court immediately of any matter affecting my standing at the bar of any other Court.

9. I have appeared *pro hac vice* in the matters *Microsoft Corp. v. Bradium Techs. LLC*, IPR2015-01432; *Microsoft Corp. v. Bradium Techs. LLC*, IPR2015-01434; *Microsoft Corp. v. Bradium Techs. LLC*, IPR2015-01435; *Microsoft Corp. v. Bradium Techs. LLC*, 2016-00448; *Microsoft Corp. v. Bradium Techs. LLC*, IPR2016-00449; *Microsoft Corp. v. Bradium Techs. LLC*, 2016-01897; *Prism Pharma Co., Ltd., v. Choongwae Pharma Corp.*, IPR2014-00315; *Apple Inc., v. Limestone Memory Systems LLC*, IPR2016-01561; *Apple Inc., v. Limestone Memory Systems LLC*, IPR2016-01567.

10. I have also appeared *pro hac vice* in the matters *Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC*, IPR2017-00336; *Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies,*

*LLC, IPR2017-00347; Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC, IPR2017-00353; Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC, IPR2017-00355; Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC, IPR2017-00357; Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC, IPR2017-01190; Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC, IPR2017-01218.*

11. I have an established familiarity with the subject matter at issue in this proceeding, having represented Patent Owner in prior *inter partes* reviews for the patent at issue in this proceeding, U.S. Pat. 9,253,239 and for related patents. I have also represented Patent Owner in litigation (now concluded) regarding to U.S. Pat 9,253,239 and related patents.

12. I hereby respectfully request that the PTAB grant Patent Owner Bradium Technologies LLC's application to permit me to appear and participate *pro hac vice* in this case.

13. I understand that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and may jeopardize the validity of the application or any patent issuing thereon. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 8, 2018

/s/ Michael N. Zachary  
Michael N. Zachary