

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HEWLETT PACKARD ENTERPRISE COMPANY,
Petitioner,

v.

CHRIMAR SYSTEMS, INC.,
Patent Owner.

Case No. IPR2019-00032
Patent No. 8,155,012

**DECLARATION OF KARON N. FOWLER IN SUPPORT OF
PETITIONER'S MOTION FOR ADMISSION
PRO HAC VICE OF KARON N. FOWLER
PURSUANT TO 37 C.F.R. § 42.10**

I, Karon N. Fowler, declare as follows:

1. I am an associate at Morgan, Lewis & Bockius LLP (“Morgan Lewis”). I joined Morgan Lewis as an intellectual property litigation associate in 2016 after serving as a judicial law clerk for the Honorable Eduardo C. Robreno in the U.S. District Court of the Eastern District of Pennsylvania.

2. Since joining Morgan Lewis, I have primarily focused my practice on patent litigation. In that time, I have gained experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on infringement and validity issues, preparing for depositions of technical experts and fact witnesses, briefing claim construction issues, preparing for *Markman* hearings, drafting dispositive motions on a range of technical issues, and representing clients in patent litigation trials and hearings before district courts around the country, arbitral panels, and the International Trade Commission. Further, I have assisted my colleagues at Morgan Lewis in proceedings before the Patent Trial & Appeal Board, and I am familiar with its established practices.

3. I am a member in good standing of the California State Bar (Bar No. 308145). I am also admitted to practice in the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the Ninth Circuit, and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

4. I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrated body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

5. 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 37 C.F.R. I acknowledge and agree that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

6. I have not applied for *pro hac vice* admission before the Office in any other proceeding during the past three years. I am concurrently applying for *pro hac vice* admission in the following IPR proceedings: IPR2019-00032 and IPR2019-00033.

7. I have established familiarity with the subject matter at issue this proceeding. I have reviewed in detail and am familiar with U.S. Patent No. 8,155,012 and all exhibits relied upon by Petitioner in this proceeding. I also participated in drafting the Petition in this proceeding. Moreover, I have engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with Hersh Mehta, who is a registered practitioner and the lead counsel for Petitioner in this proceeding.

8. In addition to the foregoing, I have gained experience with a range of network communication technologies as a patent litigator. For example, I have been involved in district court matters concerning computer network activity monitors (*Packet Intelligence LLC v. NetScout Systems, Inc.*, No. 2:16-CV-230-JRG (E.D. Tex.)), fax-to-e-mail communication systems via data network (*OpenPrint LLC v. HP Inc.*, 1:17-cv-01077-GMS (D. Del.)), and serial data communication technology for movable barrier operators (*Certain Access Control Systems And Components Thereof*, Inv. No. 337-TA-1016 (U.S.I.T.C.)).

9. I hereby 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 are 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.

10. I executed this declaration on October 26, 2018, in Palo Alto, California.

Dated: October 26, 2018

By: /Karon N. Fowler/
Karon N. Fowler

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 26, 2018, a complete and entire copy of **DECLARATION OF KARON N. FOWLER IN SUPPORT OF PETITIONER'S MOTION FOR ADMISSION PRO HAC VICE OF KARON N. FOWLER PURSUANT TO 37 C.F.R. § 42.10**, was served on all Patent Owner's counsel of record via electronic mail as follows:

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Dated: October 26, 2018

/Hersh H. Mehta/
Hersh H. Mehta (Reg. No. 62,336)