

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AXIS COMMUNICATIONS AB, CANON, INC., AND CANON U.S.A., INC.,
Petitioners,

v.

AVIGILON FORTRESS CORPORATION
Patent Owner.

Case IPR2019-00235

Patent No. 7,868,912

**DECLARATION OF MICHAEL W. DE VRIES IN SUPPORT OF
UNOPPOSED MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF
PATENT OWNER AVIGILON FORTRESS CORPORATION**

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I, Michael W. De Vries, do hereby declare:

1. I am a partner in the law firm Kirkland & Ellis LLP. Lead counsel in this *inter partes* review proceeding is Eugene Goryunov, who is a partner in the law firm Kirkland & Ellis LLP, and is registered to practice before the PTO and holds Registration No. 61,579. With respect to this proceeding, I will work closely with Mr. Goryunov.
2. I hold a Bachelor of Arts degree in Political Science and English from the University of California at Berkley. I hold a Juris Doctor degree from the University of California, Berkeley School of Law, and hold a Certificate in Law and Technology from the Berkeley Center for Law & Technology.
3. I have more than 17 years of experience as a litigation attorney who specializes in patent litigation and represents clients in patent litigation matters in various United States District Courts, the Court of Appeals for the Federal Circuit, and before the International Trade Commission. My experience includes several matters related to computer systems and networked communications technologies, and I have particular experience relevant to the technological and legal matters at issue in this proceeding. I am, therefore, an experienced patent litigation attorney with particular expertise that is pertinent to this proceeding. Avigilon Fortress Corporation

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(“Avigilon”) desires, and have a need, to be represented in certain aspects of these proceedings by an experienced patent litigation attorney who has particular expertise that is relevant to the issues in this proceeding.

4. I have also led efforts to educate attorneys at Kirkland & Ellis LLP about the *Inter Partes* Review procedures and have participated in preparing multiple *Inter Partes* Review petitions.
5. I am very familiar with U.S. Patent No. 7,868,912, and with the legal subject matter, technical subject matter, and prior art discussed in Avigilon’s Request for *Inter Partes* Review of U.S. Patent No. 7,868,912, which forms the basis for this proceeding.
6. I am a member in good standing of the Bar of the State of California. I am admitted to practice before the United States District Court for the Eastern District of Texas, the United States District Court for the Eastern District of California, the United States District Court for the Eastern District of California, the United States District Court for the Northern District of California, the United States District Court for the Central District of California, the United States District Court for the Southern District of California, the United States District Court of Colorado, the United States District Court for the Eastern District of Michigan, the United States Court of

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Appeals for the Federal Circuit, and the United States Court of Appeals for the Eleventh Circuit.

7. I have never been suspended or disbarred from practice before any court or administrative body.
8. I have never had a court or administrative body deny my application for admission to practice.
9. I have never been sanctioned or cited for contempt by any court or administrative body.
10. 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.
11. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
12. In the past 3 years, I was admitted *pro hac vice* as counsel for before the PTAB in the following actions:
 - *Inter Partes* Reviews IPR2014-01457, IPR2014-01458, IPR2014-01459, IPR2015-01052, IPR2015-01053, and IPR2015-01054 as counsel for Biscotti concerning a Real Time Video Communications System.
 - *Inter Partes* Reviews IPR2015-00999 and IPR2015-01001 as counsel for Cisco Systems, Inc. concerning Admissions Control In A Connectionless Communications Network, and Providing Media Communication Across

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Firewalls, respectively.

- *Inter Partes* Reviews IPR2016-01398, IPR2016-01401, and IPR2016-01402 as counsel for Intel Corp. concerning Security Processor With Bus Configuration, Performance Based Packet Ordering In A PCI Express Bus, and Method For Effecting The Controlled Shutdown Of Data Processing Units, respectively.
 - *Inter Partes* Review IPR2016-01434 as counsel for Oracle Corporation concerning an Apparatus For Distributing Content Objects To A Personalized Access Point Of A User Over A Network-Based Environment And Method.
 - *Inter Partes* Review IPR2017-00609, IPR2017-00610, and IPR2017-00616 as counsel for LivePerson, Inc. concerning Integrated Chat Client With Calling Party Choice; Interaction Management; And Method and Apparatus for Intelligent Routing of Incoming Calls to Representatives in a Call Center, respectively.
 - *Inter Partes* Review IPR2018-00320 as counsel for Sierra Wireless, Inc. concerning Method and Devices for the Transmission of Data with Transmission Error Checking.
 - *Inter Partes* Reviews IPR2017-02183, IPR2018-00128, IPR2018-00176 as counsel for Motorola Solutions, Inc. concerning concerning a Method of Efficiently Synchronizing to a Desired Timeslot in a Time Division Multiple Access Communication System.
 - *Inter Partes* Review IPR2018-01268 as counsel for Avigilon Patent Holding 1 Corp. concerning a Method and System for Programmable Camera for Configurable Security and Surveillance Systems.
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;

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