

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 No. IPR2019-00235

Patent No. 7,868,912

**DECLARATION OF ADAM R. ALPER IN SUPPORT OF UNOPPOSED
MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT
OWNER AVIGILON FORTRESS CORPORATION**

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I, Adam R. Alper, 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 Economics from Stanford University. I hold a Juris Doctor degree from the University of Arizona, James E. Rogers School of Law.
3. I have more than 18 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 many matters in the electrical and computer science arts, 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 (“Avigilon”) desires, and has 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.

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4. 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 Petitioner's Request for *Inter Partes* Review of U.S. Patent No. 7,868,912, which forms the basis for this proceeding.
5. I am a member in good standing of the Bar of the State of California. I am admitted to practice before the U.S. District Court for the Northern District of California, the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Federal Circuit, the U.S. District Court for the Central District of California, the U.S. District Court for the Western District of Wisconsin, the U.S. Court Of Appeals For The Third Circuit, and the U.S. District Court for the Eastern District Of Texas (*Pro Hac Vice*).
6. I have never been suspended or disbarred from practice before any court or administrative body.
7. I have never had a court or administrative body deny my application for admission to practice.
8. I have never been sanctioned or cited for contempt by any court or administrative body.
9. 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.

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10. 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).
11. In the past four years, I was admitted pro hac vice as counsel 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 Firewalls, respectively.
 - *Inter Partes* Reviews IPR2016-00589, IPR2016-00590, IPR2016-00591, and IPR2016-00592 as counsel for Eagle View Technologies, Inc. concerning Concurrent Display Systems And Methods For Aerial Roof Estimation, Pitch Determination Systems And Methods For Aerial Roof Estimation, and Concurrent Display Systems And Methods For Aerial Roof Estimation, respectively.
 - *Inter Partes* Reviews IPR2016-00593 and IPR2016-00594 as counsel for Pictometry International Corp. concerning Systems And Methods For Processing Images With Edge Detection And Snap-To Feature And System and Process For Roof Measurement Using Aerial Imagery, respectively.
 - *Inter Partes* Review IPR2016-01402 as counsel for Intel Corp. concerning a Method For Effecting The Controlled Shutdown Of Data Processing Units.
 - *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.

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- *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* Review IPR2017-02183, IPR2018-00128, IPR2018-00176 as counsel for Motorola Solutions, Inc. 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.
12. 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 and that such willful false statements may jeopardize the validity of U.S. Patent No. 7,868,912.

Date: January 9, 2019

Respectfully submitted,

/s/ Adam R. Alper/

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