

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

AVIGILON FORTRESS CORPORATION,
Patent Owner.

Case No. IPR2019-00311

Patent No. 7,932,923

**DECLARATION OF AKSHAY S. DEORAS IN SUPPORT OF
UNOPPOSED MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF
PATENT OWNER AVIGILON FORTRESS CORPORATION**

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I, Akshay S. Deoras, 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 Science degree in Electrical Engineering from Columbia University. I hold a Juris Doctor degree from the Columbia University School of Law.
3. I have more than 9 years of experience as a litigation attorney who specializes in patent litigation and representing 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 in the electrical, computer science, and chemical 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. 7,932,923, 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. 7,932,923, which forms the basis for this proceeding.
5. I am a member in good standing of the Bar of the State of California and the State of New York. I am admitted to practice before the U.S. District Court for the Northern District of California and the U.S. Court of Appeals for the Federal Circuit.
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.
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:

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- *Inter Partes* Review IPR2016-01402 as counsel for Intel Corporation concerning a Method For Effecting The Controlled Shutdown Of Data Processing Units.
 - *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. 7,932,923.

Date: January 9, 2019

Respectfully submitted,

/s/ Akshay S. Deoras/

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