

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

GOPRO, INC., GARMIN INTERNATIONAL, INC., GARMIN USA, INC.

Petitioners,

v.

CELLSPIN SOFT, INC.

Patent Owner.

---

Case No. IPR2019-01108  
U.S. Patent No. 9,258,698

**DECLARATION OF KARINEH KHACHATOURIAN IN SUPPORT OF  
PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*  
ADMISSION**

I, Karineh Khachatourian, declare the following:

1. I am a partner in the law firm of Rimon P.C., working as the managing partner of the firm's office in Palo Alto, California.
2. I am a member in good standing of the California Bar.
3. My California Bar member number is 202634.
4. I have never been suspended or disbarred from practice before any court or administrative body.
5. I have never had a court or administrative body deny my application for admission to practice.
6. I have never had any court or administrative body impose sanctions or contempt citations against me.
7. I have applied to appear pro hac vice in the following Patent Trial and Appeal Board ("PTAB"), or United States Patent and Trademark Office ("USPTO"), proceedings in at least the last three years: IPR2015-01078, IPR2015-01080, IPR2017-01070, IPR2017-01071, IPR2017-01391, IPR2017-01392, IPR2017-01393, IPR2017-01405, IPR2017-01406, IPR2017-01409, IPR2017-01410, IPR2018-00401, and IPR2019-01107.
8. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of Title 37 of the C.F.R.

9. I agree to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 et seq., the 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).

10. I am an experienced litigation attorney, with over twenty years of experience in many patent infringement litigations in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, Markman hearings, motion practice, and trials and hearings. I have represented Petitioner GoPro, Inc. (“GoPro” or “Petitioner”) in patent litigation and IPR matters for approximately six years.

11. I have been lead counsel for Petitioner GoPro, Inc. in the ongoing litigation captioned *Cellspin Soft, Inc., v. GoPro Inc.*, Case No. 4:17-cv-05939 (N.D. Cal.) (filed Mar. 2, 2018) (“the co-pending litigation”) since its inception and have been actively involved in all aspects of the co-pending litigation, which relates to and involves the same patent at issue in this proceeding. I am familiar with the subject matter of the claimed invention and was involved in a validity challenge at the district court level based on 35 U.S.C. § 101 (“Section 101”). I have also been involved in Cellspin’s appeal of the district court order invalidating the patent at issue based on Section 101. Moreover, Petitioner has hired me to represent it in this Petition because of my litigation and PTAB experience. I also

participated in the preparation of GoPro's Petition, and I am familiar with the prior art references based on that preparation.

12. Attached as Exhibit A is a true and correct copy of an email exchange I had with John Edmonds, counsel for Patent Owner, wherein he stated that Cellspin does not oppose my application.

13. I hereby declare that all statements 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 are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: July 15, 2019

Respectfully Submitted,

/ Karineh Khachatourian /  
Karineh Khachatourian  
Rimon, P.C.  
2479 E. Bayshore Rd. Suite 210  
Palo Alto, CA 94304  
Telephone: (650) 223-7785  
Fax: (650) 223-7785

# EXHIBIT A

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.