

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LKQ Corporation and Keystone Automotive Industries, Inc.,

Petitioners,

v.

GM Global Technology Operations LLC,

Patent Owner.

Case No.: IPR2020-00534

U.S. Design Patent No. D797,625 S

**DECLARATION OF IFTEKHAR A. ZAIM IN SUPPORT OF
PETITIONER'S UNOPPOSED MOTION
FOR ADMISSION *PRO HAC VICE* UNDER 37 C.F.R. § 42.10**

IPR2020-00534

U.S. Design Patent No. D797,625 S

I, Iftekhar A. Zaim, declare as follows:

1. I am an associate at the law firm Irwin IP LLC.
2. I am a member in good standing of the Illinois State Bar (admitted on May 1, 2014).
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application for admission to practice before any court or administrative body denied.
5. I have had no sanctions or contempt citations imposed against me by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37, Code of Federal Regulations.
7. I agree to be subject to the USPTO 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).
8. I have applied to appear *pro hac vice* in two other proceeding before the Office in the last three (3) years: IPR2018-00802, in which my application to appear *pro hac vice* was granted, and IPR2020-00064, in which my application to appear *pro hac vice* is pending.

9. I am an experienced litigating attorney with almost five years' experience in private law practice as an intellectual property litigator, including substantial experience with patent litigation. I have experience with dispositive motion practice as well as fact and expert discovery. I have been substantially involved in more than eight patent cases and proceedings, including cases before various United States District Courts and the United States International Trade Commission. I have also been substantially involved in numerous other non-patent cases before United States District Courts and the United States Court of International Trade. Finally, as alluded above, I also served as counsel *pro hac vice* in a previous *inter partes* review proceeding before the Board, IPR2018-00802, and served as first chair at oral argument in that proceeding.

10. I am familiar with the subject matter and patent, U.S. Design Patent No. D797,625 S ("the '625 Patent"), at issue in this proceeding, including its prosecution history and the technical field to which the '625 Patent is addressed. In particular, I have been a member of the legal team advising the Petitioner in the instant IPR proceeding and related proceedings since September of 2020 and worked with Petitioner's expert consultants. I have thereby developed a thorough understanding of the '625 Patent, the relevant art, and the technical field.

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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.

Dated: October 16, 2020

By: /Iftekhhar A. Zaim/

Iftekhhar A. Zaim

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