

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

ZENTIAN LTD.,
Patent Owner.

Case IPR2023-00037
Patent No. 10,971,140

**DECLARATION OF KAYVAN B. NOROOZI IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Kayvan B. Noroozi, declare the following:

1. I am an attorney at Noroozi PC. I have been practicing law since November 2010 and have been practicing in the field of patent litigation since November 2012. In that time, I have been counsel of record in numerous patent litigation matters involving a variety of technologies, including cellular telecommunications, graphical user interfaces, mobile location, computer manufacturing and assembly, computer search and indexing, semiconductor Systems-on-a-Chip, light emitting diode and luminaire designs, and Power over Ethernet.

2. I am a member in good standing of the State Bar of California, and am admitted to practice before the Eastern District of Texas and Northern District of California.

3. My California State Bar Membership number is 271167.

4. I have never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body.

5. I have never had a court or administrative body deny my application for admission to practice.

6. In the past five years, I have also applied to appear *pro hac vice* before the Office in the following other proceedings:

| Proceeding | Status |
|-------------------|-----------------------------|
| IPR2018-00325 | Granted |
| IPR2018-00326 | Granted |
| IPR2018-00612 | Granted |
| IPR2018-00613 | Pending when IPR terminated |
| IPR2018-00614 | Granted |
| IPR2018-00656 | Granted |
| IPR2018-00701 | Granted |
| IPR2018-00703 | Pending when IPR terminated |
| IPR2018-00706 | Granted |
| IPR2018-00725 | Granted |
| IPR2018-00726 | Pending |
| IPR2018-00762 | Granted |
| IPR2018-00763 | Pending |
| IPR2018-00764 | Granted |
| IPR2018-00883 | Granted |
| IPR2018-01016 | Granted |
| IPR2018-01017 | Granted |
| IPR2018-01018 | Granted |
| IPR2018-01187 | Granted |
| IPR2018-01189 | Granted |

| | |
|---------------|-----------------------------|
| IPR2018-01538 | Granted |
| IPR2018-01630 | Granted |
| IPR2019-01259 | Granted |
| IPR2019-01260 | Granted |
| IPR2019-01261 | Granted |
| IPR2021-00275 | Granted |
| IPR2021-00569 | Pending when IPR terminated |
| IPR2021-00614 | Pending when IPR terminated |
| IPR2021-00615 | Pending when IPR terminated |
| IPR2021-00644 | Pending when IPR terminated |
| IPR2021-00729 | Pending when IPR terminated |
| IPR2021-00731 | Pending when IPR terminated |
| IPR2021-00827 | Granted |
| IPR2022-00341 | Granted |
| IPR2022-00342 | Granted |
| IPR2022-00348 | Granted |
| IPR2022-00455 | Granted |
| IPR2022-00462 | Granted |
| IPR2022-00467 | Granted |
| IPR2022-00468 | Granted |
| IPR2022-00618 | Granted |
| IPR2022-00626 | Granted |
| IPR2022-00648 | Granted |

| | |
|---------------|---------|
| IPR2022-00715 | Granted |
| IPR2022-01508 | Pending |
| IPR2023-00033 | Pending |
| IPR2023-00034 | Pending |
| IPR2023-00035 | Pending |
| IPR2023-00036 | Pending |

7. 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 title 37 of the Code of Federal Regulations.

8. I understand that I will 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).

9. I am familiar with the subject matter of this proceeding through my review of the challenged patent and the record in this proceeding, as well as meetings and discussions with Patent Owner and its counsel.

10. I declare that all statements made herein of my knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge that willful false statements and

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