

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.
Petitioner

v.

WESTERNGECO LLC
Patent Owner

Case No. IPR2014-00678
Patent No. 6,691,038

**DECLARATION OF CHRISTOPHER A. SUAREZ IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I, Christopher A. Suarez, declare as follows:

1. I am a member in good standing of the Bar of the State of Illinois and the Bar of the District of Columbia, and am admitted to practice in the Court of Appeals for the Federal Circuit and the Court of Appeals for the Seventh Circuit.

2. On March 18, 2014, I took and passed the USPTO Examination for Registration to Practice in Patent Cases, as confirmed by the March 20, 2014 letter from the USPTO's Office of Enrollment and Discipline attached to this affidavit as Exhibit A. I submitted the required certificate of good standing to verify my status as an attorney, along with the required oath and declaration, to the USPTO to advance the process of receiving a USPTO Attorney Registration Number soon thereafter.

3. My admission to practice before the USPTO is awaiting final approval. To confirm this, my name appeared in the USPTO's *Official Gazette* on April 22, 2014—the day before the Petition was filed in this proceeding. This notice makes clear that I am “seeking . . . registration to practice before the United States Patent and Trademark Office.” *See* Exhibit B. Individuals have until May 9, 2014 to provide comments regarding my character to the Office of Enrollment and Discipline. To the best of my knowledge, no comments have been filed to this date that would adversely affect my eligibility to practice before the USPTO, and I have no reason to expect that any such comments would be filed. Assuming that no

such comments are filed, I expect to receive a registration number soon after the May 9, 2014 date.

4. From September 2012 to September 2013, I served as a law clerk to Judge Timothy B. Dyk of the United States Court of Appeals for the Federal Circuit, and thereby increased my familiarity with the patent laws and doctrines promulgated from that court.

5. I have never been suspended or disbarred from practice before any court or administrative body.

6. I have never filed an application for admission to practice before any court or administrative body that has been denied.

7. I have never been issued sanctions or contempt citations from any court or administrative body.

8. I have read and will comply with the both 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.

9. I attest that I will be subject to, and comply with, 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).

10. I have never applied to appear *pro hac vice* in other proceedings before the Board prior to the date of this declaration. The four matters (2013IPR-

00078, 2013IPR-00087, 2013IPR-00088, and 2013IPR-00089) to which this declaration applies are the only matters for which I have ever sought *pro hac vice* admission before the Board.

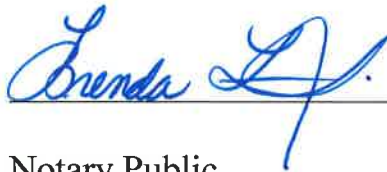
11. I have familiarity with the subject matter at issue in this proceeding. I have been intimately involved in the details of this case for more than four months, can attest that I have read background materials pertaining to the relevant technology, and have worked extensively with the pertinent experts in this matter in developing the invalidity theories presented in the Petition. These experts have explained concepts relating to marine seismic surveying and control systems to me at length and on many occasions. Additionally, I have a Bachelor's Degree in Electrical Engineering and Computer Science from the Massachusetts Institute of Technology, and my background knowledge in this area is relevant to computerized control system technology implicated by the patent at issue in this proceeding.

12. 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.

Date: April 28, 2014



Sworn to and subscribed before me
this 28 day of April, 2014.



Notary Public

By: 

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Williams & Connolly LLP
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Washington, DC 20005
Phone: 202-434-5279
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E-mail: csuarez@wc.com

Exhibit A



UNITED STATES PATENT AND TRADEMARK OFFICE

OFFICE OF ENROLLMENT AND DISCIPLINE

March 20, 2014

OED ID # 94807

Christopher Alan Suarez
Williams & Connolly LLP
70 I Street SE #721
Washington, DC 20003

NOTICE OF RESULTS OF March 18, 2014 EXAMINATION

I am pleased to inform you that you have attained a passing grade on the examination for registration to practice before the United States Patent and Trademark Office ("Office") completed on March 18, 2014.

You may not hold yourself out as a registered patent attorney or patent agent until the Office of Enrollment and Discipline ("OED") has given your application final approval. Your name will be published in the *Official Gazette* and information tending to affect your eligibility on moral and ethical grounds will be solicited. If information is received affecting your eligibility on moral or ethical grounds, you will be given an opportunity to respond.

Please complete the enclosed Data Sheet and oath. The Data Sheet is used in maintaining the register of patent attorneys and agents. The completed *original* Data Sheet, oath and a \$100.00 registration fee required by 37 CFR § 1.21(a)(2) should be submitted to: **Mail Stop OED, Director, United States Patent and Trademark Office, P. O. Box 1450, Alexandria, Virginia 22313-1450**. Please leave the **Registration Number** block blank.

To be registered, it is necessary to have and disclose to OED a postal address for your office. See 37 CFR § 11.11(a). Therefore, it is necessary for you to provide a postal business address in the Data Sheet (correspondence business address). This address will be published on the USPTO website following registration. If you provide OED with only your home address, it will be treated as the postal address of your office, and it will be published in accordance with § 11.11(a).

The name printed on your certificate of registration will be your legal first name, the first initial of your middle name and your last name, as it appears above, unless you make a separate request to OED, which must be attached to your Data Sheet. You will be registered as a patent agent unless you file, with your Data Sheet, a certificate of good standing, issued within the past six months, from the highest court of a state indicating you are an attorney. Certificates from state bars are not acceptable. If the certificate of good standing is timely filed with your oath and fee, your initial certificate of registration will reflect registration as a patent attorney.

If you are an attorney and your certificate of good standing is received after receipt of your Data Sheet, the certificate may be used to change your registration status from patent agent to patent attorney at a later date, and a separate certificate of registration will be issued to reflect registration as a patent attorney. Your initial certificate of registration will reflect registration as a patent agent. There is a \$100.00

registration processing fee required by 37 CFR §1.21(a)(2) to change your status from patent agent to patent attorney.

If you have previously filed a certificate of good standing, you must nonetheless send a new certificate of good standing in response to this notice to be registered as a patent attorney. A completed Data Sheet, oath and registration fee must be received within two (2) years of the date of this letter, or you will be required to retake the registration examination. 37 CFR § 11.8(c).

Once OED has given your application final approval, your certificate of registration will be forwarded to you at your postal business address given with your Data Sheet. *See* 37 CFR § 11.11. The date of registration that appears on your certificate will be the date of your registration. Your registration number will be indicated on your certificate.

If you wish to receive acknowledgement of the receipt of any communication, please include a self-addressed, stamped post card to be used for such purpose. The card should identify each type of paper filed. OED will stamp the receipt date on the card and place it in the outgoing mail. However, the card is not verification that all of those items you identified were present.

William R. Covey
Deputy General Counsel for Enrollment and Discipline and
Director of the Office of Enrollment and Discipline

Exhibit B

Registration to Practice

Registration to Practice

The following list contains the names of persons seeking for registration to practice before the United States Patent and Trademark Office. Final approval for registration is subject to establishing to the satisfaction of the Director of the Office of Enrollment and Discipline that the person seeking registration is of good moral character and repute. 37 CFR § 11.7 Accordingly, any information tending to affect the eligibility of any of the following persons on moral ethical or other grounds should be furnished to the Director of Enrollment and Discipline on or before May 9, 2014 at the following address: Mail Stop OED United States Patent and Trademark Office P.O. Box 1450 Alexandria VA 22314

Aubry, Anne-Raphaellev, Oblon Spivak McClelland Maier & Neustadt LLP, 1940 Duke Street, Alexandria, VA 22314

Bellum, Stephen Clifford, J.A. Lindeman & Co., 3190 Fairview Park Drive, Suite 480, Falls Church, VA 22042

Brown, Levi Scott, Bechtel Marine Propulsion Corporation, 19 Champagne Road, Eighty Four, PA 15330

Chong, Jason Yonghoon, 532 Alosio Drive, River Vale, NJ 07675

Chun, Changkun, 3147 S. Westminster Way, Bloomington, IN 47401

Denker, James Eugene, Brooks Cameron & Huebsch, PLLC, 3266 Oak View Drive, Woodbury, MN 55129

Dilk, Robert Justin, 577 E. Baseline Road Apt. 3038, Tempe, AZ 85283

Hathorn, Philip Bradford, 340 Oak Arbor Court, Johns Creek, GA 30005

Kalish, Yury, Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

Keros, Peter Evan, 2148 Bel Aire, West Bloomfield, MI 48323

Kwak, Na Mi, Novick Kim & Lee PLLC, 1604 Spring Hill Road, Suite 320, Vienna, VA 22182

Lauritzen, Wendy Renee, 3106 S. Fox Street, Arlington, VA 22202

Leege, David Dean, Fitzpatrick, Cella, Harper & Scinto, 975 F Street NW Suite 400, Washington, DC 20004

Logsdon, Charles Alan, 5406 Glendale Street, Duluth, MN 55804

Martin, Richard Walter, 2052 W. Shakespeare Avenue, Chicago, IL 60647

Mederos, Diana Frances, P.O. Box 141614, Gainesville, FL 32614

Miller, Timothy Bryce, Whitham, Curtis, Christofferson & Cook, P.C., 11491
Sunset Hills Road, Suite 340, Reston, VA 20190

Morris-Easley, Brittany Noel Delaney, 533 W. 22nd Street, Houston, TX 77008

Mouta-Bellum, Carla Alexandra S. P. M. D., Finnegan LLP, 901 New York
Avenue N.W., Washington, DC 20001

Netikosol, Joe Saratool 1230 13th Street NW #503, Washington, DC 20005

Patel, Sheetal Subhashbhai, Finnegan, Henderson, Farabow, Garrett &
Dunner, LLP, 901 New York Avenue, NW, Washington, DC 20001

April 22, 2014

US PATENT AND TRADEMARK
OFFICE

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Pennebaker, Sara Lynne, 5600 Castle Drive, Oakland, CA 94611

Poulos, John Peter, 210 Bridle Path Circle, Oak Brook, IL 60523

Schmidt, Jeffrey Wayne, UNeMed Corporation, 986099 Nebraska Medical Center,
Omaha, NE 68198-6099

Stevenson, Tarley Gwendolyn, Bickel & Brewer, 1717 Main Street, Suite 4800,
Dallas, TX 75201

Suarez, Christopher Alan, Williams & Connolly LLP, 725 Twelfth Street,
N.W., Washington, DC 20005

Valley, Cory Michael, 6803 Lumsden Street, McLean, VA 22101

March 25, 2014

WILLIAM R. COVEY
Deputy General Counsel for Enrollment and Discipline and
Director of the Office of Enrollment and Discipline