

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FRONTIER WATER SYSTEMS, LLC
Petitioner

v.

GENERAL ELECTRIC CORPORATION
Patent Owner

U.S. Patent No. 7,790,034

Filing Date: January 22, 2008

Issue Date: September 7, 2010

Title: Apparatus and Method for Treating FGD Blowdown or Similar Liquids

Inter Partes Review Case No. IPR2017-01468

**DECLARATION OF MICHAEL D. ROUNDS
IN SUPPORT OF PETITIONER'S MOTION FOR *PRO HAC VICE*
ADMISSION OF MICHAEL D. ROUNDS**

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U.S. Patent and Trademark Office

P.O. Box 1450

Alexandria, Virginia 22313

I, Michael D. Rounds, hereby declare as follows:

1. I am an attorney with the law firm of Brownstein Hyatt Farber Schreck, LLP. I have served as lead litigation counsel for FRONTIER WATER SYSTEMS, LLC. (“Frontier”), in the following related proceeding:

- *FRONTIER WATER SYSTEMS, LLC, TIMOTHY PICKETT, and JAMES PETERSON, v. GENERAL ELECTRIC COMPANY*, Civil Action No. 2:17-CV-00261-PMW (Utah).

This declaration is submitted on behalf of Petitioner, Frontier, in support of its Motion for Pro Hac Vice Admission of Michael D. Rounds. This declaration is made on my own personal knowledge, except as otherwise indicated.

2. I am a member in good standing of the Bar of the State of Nevada (Nevada Bar Number 4734) and the Bar of the State of California (California Bar Number 133972).

3. I have never been suspended or disbarred from any court or administrative body.

4. No application for admission to practice before any court or administrative body that I have filed or that has been filed on my behalf has ever been denied.

5. No sanctions or contempt citations have been imposed on me by any court or administrative body.

6. 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.

7. I agree to be subject to 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 applied, was admitted, and appeared in the following cases before the PTAB in the past three years:

- *ARUZE GAMING MACAU, LTD., v. MGT GAMING, INC.*, IPR2014-01288.
- *VSR INDUSTRIES, INC., v. COLE KEPRO INTERNATIONAL, LLC*, IPR2015-00182.

9. I have practiced patent litigation for over twenty-five years, and am intimately familiar with the subject matter at issue in this proceeding. I have spent a considerable amount of time researching and reviewing the relevant prior art and U.S. Patent 7,790,034, and substantially participated in drafting the Petition. Additionally, I am aware of the relevant case law and validity issues in the instant proceeding, and more generally, with the patent laws of the United States of America.

I state under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Date: May 24, 2017

By: / Michael D. Rounds /
Michael D. Rounds

CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b) on the Patent Owner by overnight mail of a copy of this Petition for *Inter Partes* Review and Exhibits FWS1001-FWS1022, at the correspondence address of record for U.S. Patent No. 7,790,034, and also Barbara Toop, corporate counsel for GE, at the following addresses:

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Dated: May 24, 2017

/ Adam K. Yowell /
Adam K. Yowell
Attorney for Petitioner,
Frontier Water Systems, LLC