

**DECLARATION OF CHRISTOPHER K. LARUS IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Christopher K. Larus, declare that:

- 1) I am a partner at the law firm of Robins Kaplan LLP and provide this declaration in support of Petitioner's Motion for my *pro hac vice* admission. I have personal knowledge of the matters set forth below.
- 2) I am the lead counsel for Petitioner in the parallel litigation concerning challenged patent U.S. Patent 9,723,842 (the "'842 Patent"), which is currently pending in the U.S. District Court for the District of Delaware (C.A. No. 1:18-cv-02037-LPS).
- 3) I have litigated patent infringement disputes for 26 years. My experience includes all aspects of such cases, including fact and expert discovery, *Markman* hearings, First Chair of trials, and oral arguments before both Federal district courts, as well as appeals in the United States Court of Appeals for the Federal Circuit.
- 4) I am a member in good standing of the State Bar of Minnesota and the State Bar of New York.
- 5) I have never been suspended or disbarred from practice before any court or administrative body.

admission to practice before it.


- 7) No court or administrative body has ever imposed sanctions or contempt citations on me.
- 8) 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.
- 9) I understand that I will be subject to the Office's Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.P.R. § 11.19(a).
- 10) I have established familiarity with the subject matter at issue in this proceeding. As Petitioner's lead litigation counsel in the parallel district court litigation involving the challenged patent, I am deeply familiar with the patents and the prior art that is the subject of the Petition and am charged with developing analysis and strategy for Petitioner regarding the challenged patent. In that role, I participated in preparing Petitioner's invalidity contentions, which relied in part on the same prior art presented in Petitioner's Petition, as well as Petitioner's discovery responses, which also concerned the same prior art as in Petitioner's Petition. Further, I am leading development of Petitioner's claim construction positions in the parallel district court litigation. In sum, I have been lead counsel for

Petitioner in all parts of the parallel district court litigation involving the challenged patent, and through my work, I have developed deep familiarity with the challenged patent.

- 11) I have not applied to appear *pro hac vice* with the Patent Trial and Appeal Board in the last three years. I am concurrently applying for pro hac vice admission in this proceeding and in IPR2019-01497, which also challenges the '842 Patent, as well as IPR2019-01499, which is a challenge to U.S. Patent 9,717,250, which claims priority to the '842 Patent.

Pursuant to 18 U.S.C. § 1001, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 31, 2019



Christopher K. Larus
Robins Kaplan LLP