

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BAXTER INTERNATIONAL INC.,
Petitioner,

v.

BECTON, DICKINSON AND COMPANY,
Patent Owner.

Case IPR2020-00025
U.S. Patent 9,283,367

**DECLARATION OF KEYNA CHOW IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION**

I, Keyna Chow, being duly sworn and upon oath, hereby attest to the
following:

1. I am a member in good standing of the Bar of California.
2. I have never been suspended or disbarred from practice before any court or
administrative body.

3. I have never been denied an application for admission to practice before any court or administrative body.
4. No sanction or contempt citation has ever been imposed against me by any court or administrative body.
5. 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 37 C.F.R. Part 42.
6. 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).
7. In the last three (3) years, I have previously applied to appear pro hac vice before the Office in these proceedings:

IPR2017-01144 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01145 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01146 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01147 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01148 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01149 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01150 (filed 01/11/18 (Paper 16), granted 01/19/18 (Paper 18));
IPR2017-01151 (filed 01/11/18 (Paper 15), granted 01/19/18 (Paper 17));
IPR2017-01653 (filed 06/28/18 (Paper 28), granted 08/06/18 (Paper 36));

IPR2017-00942 (filed 07/16/18 (Paper 26), granted 07/17/18 (Paper 27));

IPR2017-00943 (filed 07/16/18 (Paper 23), granted 07/17/18 (Paper 24));

IPR2019-00119 (filed 10/18/19 (Paper 29), granted 10/28/19 (Paper 30));

IPR2019-00120 (filed 10/18/19 (Paper 33), granted 10/28/19 (Paper 35));

IPR2019-00121 (filed 10/18/19 (Paper 33), granted 11/06/19 (Paper 38));

8. I am an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. I have been practicing law since 2012 and have extensive experience litigating patent infringement cases in many different District Courts across the country and the International Trade Commission, including drafting briefs before the Court, including *Markman* hearings, performing validity and infringement analyses, overseeing all aspects of claim construction, conducting discovery investigations, managing expert witnesses, taking and defending depositions. I also have extensive experience in all stages of *inter partes* review proceedings before the Board, including all aspects of both bringing and defending against *inter partes* review petitions from drafting petitions, preliminary responses, and post-institution briefing and expert reports, to taking and defending depositions, and arguing before the Board. Many of the cases that I have litigated have involved the kinds of technologies at issue in this case. I am familiar with U.S. Patent No. 9,283,367 and the issues involved in this case.

Patent Owner Becton, Dickinson and Company has requested that I
represent it in these proceedings.

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

Executed this 15th day of November 2019, in East Palo Alto, California.

/Keyna Chow/
Keyna Chow