

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
*Petitioner,*

v.

MICHIGAN MOTOR TECHNOLOGIES LLC,  
*Patent Owner*

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Case IPR2020-00446

U.S. Patent No. 6,763,804

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**AFFIDAVIT OF MS. ROBYN WILLIAMS IN SUPPORT OF  
PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Robyn Williams, recognizing that willfully false misstatements subject me to the penalty of perjury, hereby apply to appear *pro hac vice* before the Office in *Inter Partes* Review proceedings for PTAB Case No. IPR2020-00446, and attest to the following:

1. I am a member in good standing of the Bar of New York.
2. I have not been suspended or disbarred from practice before any court or administrative body;
3. I have never had an application for admission to practice before any court or administrative body denied;
4. No sanction or contempt citation has 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 part 42 of the C.F.R.;
6. I will be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. § § 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);
7. I have been admitted to appear *pro hac vice* before the Office in *Inter Partes* Review proceedings for PTAB Case No. IPR2019-01274 on April 1, 2020.
8. I intend to concurrently apply to be admitted *pro hac vice* before the Office for the following *Inter Parties* Review:

- IPR2019-01645
- IPR2020-00068
- IPR2020-00161
- IPR2020-00169
- IPR2020-00198
- IPR2020-00226
- IPR2020-00228 to IPR2020-00229
- IPR2020-00231
- IPR2020-00444 to IPR2020-00445
- IPR2020-00451 to IPR2020-00455
- IPR2020-00894.

9. I am a litigation attorney with nearly four years of experience representing clients in patent cases involving automobile technology. I regularly litigate patent cases in federal district courts and have been involved in various phases of litigation including claim construction, summary judgment, and expert discovery and appeals.

10. I have a high degree of knowledge with the subject matter at issue in this proceeding. Specifically, I am familiar with the technology and issued claims in U.S. Patent No. 6,763,804 (the “’804 patent”). I am also familiar with the prior

art references cited by Petitioners in this proceeding and the alleged grounds of invalidity.

I hereby declare that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I further declare that these statements were 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 the Title 18 of the United States Code.

Dated: June 26, 2020

Respectfully submitted,

/Robyn T. Williams/

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