

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.
Petitioner,

v.

PROMOS TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2017-00037
Patent 6,699,789

**DECLARATION OF JERRY CHEN IN SUPPORT OF
PATENT OWNER PROMOS TECHNOLOGIES INC.'S
MOTION FOR *PRO HAC VICE* ADMISSION IN IPR2017-00037**

I, Jerry Chen, declare as follows:

1. I am an attorney licensed to practice law in the State of California.
2. I am a member in good standing of the Bar of California.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application denied for admission to practice before any court or administrative body.
5. I have never had any sanctions or contempt citations imposed upon 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 the C.F.R.
7. I agree to be subject to the U.S.P.T.O. 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 have applied to appear *pro hac vice* in the following proceedings before the United States Patent and Trademark Office in the last three (3) years: IPR2015-00459, IPR2015-00460, IPR2015-00466, and IPR2015-00467.
9. I am a Partner at the law firm of TechKnowledge Law Group LLP, and I have practiced law since 2003. I have also practiced at Wilson Sonsini

Goodrich & Rosati from 2003-2008, Orrick Herrington & Sutcliffe from 2008-2009, and with Freitas Tseng & Kaufman LLP from 2012-2014. I joined TechKnowledge Law Group LLP on April 16, 2015. Virtually the entirety of my practice has consisted of patent litigation and related business litigation. Over the course of my years in practice, I have worked on a number of litigation matters related to semiconductor technology, including *In re Certain Semiconductor Chips with DRAM Circuitry* (337-TA-819); *In re Certain Semiconductor Chips with Minimized Chip Package Size* (337-TA-630); and *United Microelectronics Corp. v. LSI Corp.* (09-cv-00105).

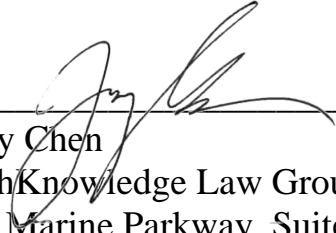
10. I have an established familiarity with the subject matter at issue in these proceedings, and I have acquired substantial understanding of the underlying legal and technological issues at stake in these proceedings. In particular, I have spent considerable time reviewing the patent-at-issue (U.S. Patent No. 6,699,789), the file history, the Petition, and all exhibits which accompanied the Petition, and all documents filed in this action. Furthermore, I have actively been involved with and worked on issues related to the '789 Patent in connection with the district court case *ProMOS Technologies, Inc. v. Samsung Electronics Co., Ltd., et al*, Case No. 1:15-cv-00898-SLR-SRF (D. Del.).

Case No. IPR2017-00037

Patent No. 6,699,789

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 and that such willful false statements may jeopardize the validity of U.S. Patent No. 6,699,789.

Dated: June 19, 2017



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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2017, a true and correct copy of the foregoing *Declaration of Jerry Chen in Support of Patent Owner ProMOS Technologies Inc.'s Motion For Pro Hac Vice Admission in IPR2017-00037* was served via email to the Petitioners by serving the correspondence email addresses of record as follows:

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