

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS
AMERICA, INC.
Petitioners,

v.

MANUFACTURING RESOURCES INTERNATIONAL, INC.
Patent Owner

U.S. Patent No. 10,506,740

Title: CONSTRICTED CONVECTION COOLING SYSTEM FOR AN
ELECTRONIC DISPLAY

Inter Partes Review No. IPR 2023-00254

**DECLARATION OF SRIKANTH K. REDDY IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

SEC et al. v. MRI
SEC Exhibit 1034.001
IPR2023-00254

I, Srikanth K. Reddy, hereby declare and swear as follows:

1. I am a partner with the law firm of Goodwin Procter LLP, 100 Northern Avenue, Boston, MA 02210.
2. I am an experienced patent litigation attorney. I have been litigating patent cases for over 16 years. I have been practicing law since 2007 and have extensive experience litigating patent infringement cases in district courts across the United States.
3. My experience in patent litigation matters includes examining non-expert and expert witnesses, arguing Markman hearings and patent dispositive motion proceedings, and representing clients in other patent-related hearings and pleadings concerning, inter alia, patent validity and infringement issues. My experience also includes the representation of a client in numerous IPRs before the Patent Trial and Appeal Board.
4. I am a member in good standing of the Massachusetts Bar (BBO# 669264) and am admitted to practice before the United States District Court for the District of Massachusetts, and the United States Court of Appeals for the Federal Circuit.
5. In the last three years, I applied to appear *pro hac vice* in IPR2023-00123. Concurrently with this application I am filing *pro hac vice* applications in IPR2023-00199, IPR2023-00220, IPR2023-00221, and IPR2023-00255.

6. I have substantial familiarity with the subject matter at issue in this proceeding. Petitioners have challenged U.S. Patent No. 10,506,740 (“the ‘740 patent”), the patent at issue in this proceeding. I have developed a strong familiarity with the ‘740 patent, its prosecution history, the general subject matter to which the ‘740 patent is directed, and the prior art references relied upon by Petitioners in support of their Papers. Furthermore, I have thoroughly reviewed the Petition and accompanying Exhibits submitted in this proceeding.

7. I have never been suspended from practice before any court or administrative body.

8. I have never had an application for admission to practice before any court or administrative body denied.

9. I have never been subject to any sanction or contempt citation imposed by any court or administrative body.

10. 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.

11. I agree to be subject to the USPTO 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).

12. I declare under penalty of perjury that the foregoing is true and correct. I further 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 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 title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Date: November 22, 2023

/Srikanth K. Reddy/
Srikanth K. Reddy