

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. 9,629,287

Title: SYSTEM FOR USING CONSTRICTED CONVECTION WITH CLOSED
LOOP COOLING SYSTEM AS THE CONVECTION PLATE

Inter Partes Review No. IPR 2023-00255

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

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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 1051.001
IPR2023-00255

I, Christine Potkay, hereby declare and swear as follows:

1. I am an associate with the law firm of Goodwin Procter LLP, 620 8th Ave, New York, NY 10018.
2. I am a member in good standing of the Bar of the State of New York (Bar Number 5581640).
3. I am a member in good standing in all jurisdictions where I have been admitted to practice.
4. I have practiced law since 2017. My practice at Goodwin Procter LLP has included litigating patent infringement cases. My experience in patent litigation matters includes examining expert and non-expert witnesses at deposition, presentation of non-expert testimony at a hearing, and other patent-related pleadings concerning, inter alia, patent validity and infringement issues.
5. In the last three years, I have not applied to appear *pro hac vice* in any other proceedings before the United States Patent and Trademark Office.
6. I have substantial familiarity with the subject matter at issue in this proceeding. Petitioners have challenged U.S. Patent No. 9,629,287 (“the ’287 patent”), the patent at issue in this proceeding. I represent Petitioners in the International Trade Commission proceeding in which Patent Owner asserted the ’287 patent, *Certain Outdoor and Semi-Outdoor Elec. Displays, Prods.*

Containing the Same, and Components Thereof, Inv. No. 337-TA-1331. I have developed a strong familiarity with the '287 patent, its prosecution history, the general subject matter to which the '287 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 or disbarred 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 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).

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: April 16, 2024

/Christine Potkay/
Christine Potkay