

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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KEA CLOUD, INC. & HI AUTO, INC.,  
Petitioners,

v.

VALYANT AI, INC.,  
Patent Owner

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IPR2023-00450  
U.S. PATENT NO. 10,592,706

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**DECLARATION OF RICHARD D. ROCHFORD IN SUPPORT OF  
PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Richard D. Rochford, being duly sworn and upon oath, hereby attest to the following:

1. I am a partner at the firm of Haynes and Boone, where I am a chair of the Intellectual Property Litigation Practice Group.

2. I am a member in good standing of the Bar of New York (#1755016), the Bar of Virginia (#24651), the Bar of District of Columbia (#386875), and the Bar of Massachusetts (#423950), as well as numerous federal district courts and the First, Second, Third, Fourth, D.C., and Federal Circuit.

3. I have not been suspended or disbarred from practice before any court or administrative body.

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

5. No sanction or contempt citation has been imposed against 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 Code of Federal Regulations.

7. I will be subject to the United States Patent and Trademark Office 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. In the last three years I have not applied to appear *pro hac vice* before the Office in any proceedings, and I am not concurrently applying to appear *pro hac vice* before the Office in any other proceedings.

9. I am an experienced patent litigation attorney. I have practiced patent litigation for over 30 years, and have litigated patent infringement, invalidity and enforceability in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, trials and hearings, investigations before the International Trade Commission, and argued appeals before the Federal Cir.

10. I represent the Patent Owner Valyant AI, Inc., as a principal attorney in the co-pending and on-going litigation in which U.S. Patent No. 10,592,706 is asserted against the Petitioners Kea Cloud, Inc., and Hi-Auto Inc. I am familiar with the subject matter in this proceeding as a result of my representation of Valyant AI, Inc. in the related litigation, which I expect to significantly overlap with the grounds for unpatentability set form in the Petition for IPR2023-00450.

11. I 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 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 18 U.S.C. § 1001.

Date: April 28, 2023

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