

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC. and AMAZON.COM SERVICES LLC,
Petitioners

v.

NOKIA TECHNOLOGIES OY,
Patent Owner.

IPR2024-00572
U.S. Patent No. 7,724,818

AFFIDAVIT OF ANDREW KLEIN IN SUPPORT OF PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION

I, Andrew Klein, being duly sworn and upon oath, hereby apply to appear *pro hac vice* before the Office in *inter partes* review Case No. IPR2024-00572 on U.S. Patent 7,724,818 and hereby attest to the following:

1. I am a member in good standing of the State Bar of California. I have also been admitted *pro hac vice* to the United States District Courts of Eastern District of Texas, and Western District of Texas.

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, as set forth in Title 37, Part 42 of the C.F.R., and the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 et seq.

6. I will be subject to the USPTO Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 et seq. and the USPTO's disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I am an experienced patent litigation attorney with more than 10 years of experience representing clients in cases involving patents and other intellectual property interests. I litigate patent cases in various forums, including federal district courts across the United States. Through my experience in patent litigation matters, I have represented clients in many phases of litigation including jury trials, *Markman* hearings, discovery, and appeals. My biography is attached hereto as Appendix A.

8. I have familiarity with the subject matter at issue in this proceeding and represent Petitioners as counsel in a parallel proceeding against Patent Owner involving the same technology (*Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, and Components and Modules Thereof*, Inv. No. 337-TA-1380 (ITC), filed October 31, 2023). In this case, I handle all phases of the litigation from discovery through trial and will continue to be involved in the case as counsel.

9. I am familiar with the technologies and issued claims in the '818 Patent. I am familiar with the prior art references cited in PTAB Case Nos. IPR2024-00572 and the associated invalidity grounds before the PTAB.

10. In the previous three years, I have applied to appear *pro hac vice* before the Office in:

Adobe Inc. v. RAH Color Technologies LLC: IPR2019-00627, IPR2019-00628, IPR2019-00629, IPR2019-00646;

H-E-B, LP v. Digital Retail Apps, Inc.: IPR2020-00148, IPR2020-00149,
IPR2020-00347, IPR2020-00348;

Netskope, Inc. v. Bitglass, Inc.: IPR2021-01045, IPR2021-01046, PGR2021-
00091, PGR2021-00092; and

Netskope, Inc. v. Fortinet, Inc.: IPR2023-00030, IPR2023-00175, IPR2023-
00456, IPR2023-00457, IPR2023-00458, IPR2023-00459, IPR2022-01587.

I hereby declare that all statements made on 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.

Respectfully submitted,

Dated: March 17, 2024

By: / Andrew N. Klein /
Andrew Klein

Attorney for Petitioners

APPENDIX A



Andrew Klein

PARTNER

Patent Litigation

Palo Alto, CA

AKlein@perkinscoie.com

650.838.4409 | [Website Bio](#)

Andrew is a go-to trial lawyer for high-stakes intellectual property disputes, focusing on patent litigation.

Andrew Klein is a skilled trial lawyer who represents *Fortune* 500 and emerging companies in their most important intellectual property disputes. He is adept at understanding each client's unique legal and business needs and crafting a winning legal strategy to achieve them. Andrew uses his skills as an experienced trial litigator to secure wins for his clients and excels at explaining complicated technical matters in simple, understandable terms for juries and judges. Andrew has handled cases in a variety of high-tech areas, including acoustics, computer programming, color management, surveillance, refrigeration, retail, video processing (e.g., H.264 and H.265), network and computer security, and telecommunications.

Prior to working at Perkins Coie, Andrew externed for Chief Justice Tani G. Cantil-Sakauye of the California Supreme Court and Judge John E. Munter of the complex litigation division in San Francisco Superior Court. He maintains an active *pro bono* practice representing nonprofits and indigent clients in a variety of matters, including intellectual property issues.

Experience

Patent Litigation Relating to Color Reproduction

Representing defendant in patent litigation involving color management systems.

Patent Litigation Relating to Speaker Assemblies

Representing plaintiff in patent litigation against hardware and software company relating to speaker assemblies in desktop and mobile devices.

Commercial Litigation Relating to Automated Bots

Representing plaintiff in commercial litigation alleging trademark and copyright infringement, among other things.

Commercial Litigation Relating to Video Games

Represented owner of copyright in video game in commercial litigation alleging, among other things, copyright infringement.

Bar Admissions

- California

Court Admissions

- U.S. District Court for the Central District of California
- U.S. District Court for the Northern District of California

Education

- University of California, College of the Law, San Francisco, J.D., 2014, *cum laude*, Staff Editor; Articles Editor, *Hastings Law Journal*
- California State University, Long Beach, B.A., Communications; Culture and Public Affairs, 2011, *magna cum laude*

Professional Recognition

- Recognized by *Best Lawyers: Ones to Watch* for Intellectual Property Law, 2024-2025

Related Employment

- Perkins Coie LLP, Law Clerk, 2014
- California Supreme Court, San Francisco, CA, Judicial Extern, 2013
- San Francisco Superior Court, Complex Litigation, San Francisco, CA, Judicial Extern, 2012