

# PI- NET 2013

Filed on behalf of Pi-Net International, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**Covered Business Method Review of U.S. Patent No. 8,037,158**

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SAP America, Inc.

Petitioner

v.

Pi-Net International, Inc.

Patent Owner

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**CASE CBM 2014-00018**

**Patent 8,037,158**

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**Declaration of Dr. Lakshmi Arunachalam in Support of**

**Motion for *Pro Hac Vice* Admission**

**Declaration of Dr. Lakshmi Arunachalam in Support of  
Motion for *Pro Hac Vice* Admission**

I, LAKSHMI ARUNACHALAM, hereby declare as follows on behalf of myself—as the named inventor of U.S. patent number 8,037,158—and as Chief Executive Officer of Pi-Net International, Inc.:

1. I am the named inventor of U.S. patent number 8,037,158, which is the patent at issue in the present *inter partes* review proceeding.
2. I am the Chief Executive Officer for the assignee of U.S. patent number 8,037,158—Pi-Net International, Inc.—and am authorized to make the present declaration on its behalf.
3. Attorneys from the law firm of Lewis Roca Rothgerber LLP are currently named as lead and back up counsel of record for the present *inter partes* review proceeding. *See* PAPER NOS. 41-42 (filed March 10, 2014).
4. I wish to seek the admission of an additional attorney with the law firm of Lewis Roca Rothgerber LLP as counsel in the present case—Mr. Colby B. Springer.

5. I understand that while Mr. Springer is an attorney licensed to practice law by the State Bar of California that he is not admitted to practice before the United States Patent and Trademark Office.
6. Notwithstanding Mr. Springer's lack of admission before the United States Patent and Trademark Office, I wish to have Mr. Springer admitted in the above captioned case *pro hac vice*.
7. I am aware that Mr. Springer would be subject to the supervision of lead counsel in this matter, Ms. Tam Thanh Pham, who is a registered practitioner before the United States Patent and Trademark Office.
8. I believe that due to the quasi-litigation nature of an *inter partes* review proceeding—including but not limited to limited document discovery, protective orders, motion practice, direct examination via declaration, cross-examination via deposition, oral argument, and the Federal Rules of Evidence—that the interests of the patent owner, Pi-Net International, Inc., would best be represented by both registered patent practitioners (including the aforementioned Ms. Pham and Ms. May Eaton—current back-up counsel for this proceeding) and an experienced litigation attorney such as Mr. Springer.
9. I am aware of Mr. Springer's experiential background in patent litigation and intellectual property and believe him to be an

experienced litigating attorney that would help best represent the interests of the assignee in the present *inter partes* review proceeding.

10. I have worked with Mr. Springer in various facets, since late 2008 or early 2009, concerning the technical subject matter of U.S. patent number 8,037,158.
11. In light of those many years of experience, I believe—as both the inventor of the patent at issue as well as the CEO for the assignee of that patent—that Mr. Springer is quite familiar with the subject matter at issue in the present *inter partes* review proceeding and has extensive experience with the patents in my patent portfolio that derive priority from U.S. provisional application number 60/006,634. I believe that there is no one better suited than Mr. Springer to represent Pi-Net International, Inc. before the Patent Trial and Appeal Board in the various *inter partes* review proceedings and covered business method proceedings for various patents in the Pi-Net International portfolio.
12. The patent owner will not request any delay in the present or any other proceedings on the basis that Mr. Springer is just now being admitted *pro hac vice*.

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