UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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QUALTRICS, LLC
Petitioner

v.

OPINIONLAB, INC.
Patent Owner

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Case IPR2014-00366
U.S. Patent 8,041,805

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**DECLARATION OF JONATHAN M. JACKSON IN SUPPORT OF
PETITIONER QUALTRICS, LLC'S MOTION FOR
PRO HAC VICE ADMISSION UNDER 37 C.F.R. § 42.10(c)**

FILED VIA PRPS

I, Jonathan M. Jackson, resident of Los Angeles, California, declare as follows:

1.   I am an attorney at the firm of Latham & Watkins LLP, counsel of record for Petitioner Qualtrics, LLC ("Petitioner"). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently under oath thereto.

2.   I am a member in good standing of the State Bar of California (Bar No. 257554) and am also admitted to practice before the U.S. District Court for the Central District of California and the U.S. Court of Appeals for the Ninth Circuit.

3.   I have never been suspended or disbarred from practice before any court or administrative body. No application of mine for admission to practice before any court or administrative body has ever been denied. No court or administrative body has imposed sanctions or contempt citations against me.

4.   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 C.F.R. I acknowledge and agree that I will 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).

5.   I have an undergraduate degree in Industrial Engineering from Stanford University, and graduated first in my class at the UCLA School of Law in

2007. I served as a judicial clerk for Judge Stephen V. Wilson, in the U.S. District

Court for the Central District of California, and for Judge Carlos T. Bea, in the

U.S. Court of Appeals for the Ninth Circuit.

6.   Including my judicial clerkships, I have over seven years of litigation

experience, including, in particular, experience in intellectual property litigation. I

am a member of the Latham & Watkins intellectual property group, with a focus

on patent litigation involving software and Web-enabled applications.

7.   I have been actively involved in the related district court litigation

between OpinionLab, Inc. (the "Patent Owner") and Petitioner, *OpinionLab, Inc. v.*

Qualtrics Labs, Inc. et al., 1:13-cv-01574 (N.D. Ill.) since at least March 27, 2013,

when I was granted leave to appear *pro hac vice* in that matter.

8.   U.S. Patent No. 8,041,805 (the "'805 Patent"), which is at issue in this

proceeding, is one of six patents asserted by the Patent Owner in the district court

litigation. I have been actively involved in all aspects of the litigation, including

Petitioner's factual investigation and development of its invalidity positions

regarding the claims of the '805 Patent at issue here.

9.   I have also been actively involved in the research and preparation of

the Petition for *Inter Partes* Review submitted in this proceeding, as well as the

petitions submitted in four related proceedings that are currently pending before

the Patent Trial and Appeal Board:

- Case No. IPR2014-00406: Petition for *Inter Partes* Review of U.S. Patent No. 7,085,820, which is a continuation-in-part of U.S. Patent No. 6,421,724; the '805 Patent – the patent at issue in this proceeding – is a continuation of U.S. Patent No. 7,085,820;

- Case No. IPR2014-00356: Petition for *Inter Partes* Review of U.S. Patent No. 6,606,581, which is a continuation-in-part of U.S. Patent No. 6,421,724;

- Case No. IPR2014-00420: Petition for *Inter Partes* Review of U.S. Patent No. 7,370,285;

- Case No. IPR2014-00421: Petition for *Inter Partes* Review of U.S. Patent No. 8,024,668, which is a continuation of U.S. Patent No. 7,370,285.

10.   I am concurrently seeking *pro hac vice* admission to appear in each of these related proceedings. I have not applied to appear *pro hac vice* in any other proceeding before the USPTO.

Executed on November 11, 2014 in Los Angeles, California.

_____
Jonathan M. Jackson

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the parties' agreement to electronic

service on August 21, 2014, I certify that on this 11th day of November,

2014, a copy of:

**DECLARATION OF JONATHAN M. JACKSON IN SUPPORT OF
PETITIONER QUALTRICS, LLC'S MOTION FOR
PRO HAC VICE ADMISSION UNDER 37 C.F.R. § 42.10(c)**

was served by electronic mail on Patent Owner's lead and backup counsel, at the

following email addresses:

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