

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PAYPAL, INC.,
Petitioner,

v.

MONEYCAT LTD.,
Patent Owner

IPR2017-00542
U.S. Patent No. 8,712,918

Title: ELECTRONIC CURRENCY, ELECTRONIC WALLET THEREFOR
AND ELECTRONIC PAYMENT SYSTEMS EMPLOYING THEM

**DECLARATION OF JARED BOBROW IN SUPPORT OF PETITIONER'S
MOTION FOR ADMISSION *PRO HAC VICE***

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P.O. Box 1450
Alexandria, VA 22313-1450

I, Jared Bobrow, hereby declare as follows:

1. I am a member in good standing of the State Bar of California. I was admitted to the California State Bar on June 16, 1988. My California Bar membership number is 133712. I am admitted to practice before the District Courts of the Northern, Central, Southern and Eastern Districts of California, and the Eastern District of Texas. I am also admitted to practice before the California State Supreme Court, U.S. Court of Appeals for the Federal Circuit, Ninth Circuit, and First Circuit. Since 1988 I have practiced in the field of civil litigation. For over 25 years, my practice has been focused on the field of intellectual property, particularly patent litigation.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never had a court or administrative body deny my application for admission to practice.
4. I have never had any sanctions or contempt citations imposed on 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 set forth in part 42 of 37 C.F.R.

6. I agree to 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).

7. I have applied to appear *pro hac vice* before this office in the following proceedings in the past three years: CBM2014-00091, CBM2014-00092, and CBM2014-00093. I was admitted to practice in these proceedings, which are related to the current proceeding, as back-up counsel on March 10, 2015, subject to filing a supplemental declaration, which filing occurred on March 19, 2015. I have also applied to appear *pro hac vice* before this office in the following proceeding in the past three years: IPR2015-00657, IPR2015-00658, IPR2015-00660, IPR2015-00662, and IPR2015-00666. I was admitted to practice in these proceedings as back-up counsel only on May 29, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2014-01197, IRP2014-01207, and IPR2014-01209. I was admitted to practice in these proceedings as back-up counsel on September 16, 2015. I have also applied to appear *pro hac vice* before this office in the following proceedings in the past three years: IPR2016-00320, IPR2016-00322, IPR2016-00323, IPR2016-00330. I was admitted to practice in these proceedings as back-up counsel on September 26, 2016. I have also applied to appear *pro hac vice* before this office in the following proceeding in the past three years: IPR2016-00782. The application was filed on

October 3, 2016 and is pending before this office. I have also applied to appear *pro hac vice* before this office in the following proceedings: IPR2017-00279, IPR2017-00280, IPR2017-00281, IPR2017-00282, IPR2017-00391, IPR2017-00392, and IPR2017-00406. These applications were filed on January 20, 2017 and are pending before this office. I am also concurrently applying to appear *pro hac vice* before this office in the following proceedings: CBM2017-00024, CBM2017-00025, CBM2017-00026, CBM2017-00027, CBM2017-00028, CBM2017-00029, as well as CBM2017-00030, and IPR2017-00541.

8. I am an experienced litigation attorney, with particular experience in patent infringement litigations in District Courts across the country, including experience with fact and expert deposition discovery, claim construction, *Markman* hearings, motion practice, trials, and hearings.

9. I am counsel for PayPal, Inc. (“PayPal”), Petitioner and the defendant in a related pending litigation in the United States District Court for the Northern District of California, in which U.S. Patent Nos. 7,590,602, 8,051,011, and 8,195,578 are asserted by the Patent Owner (*MoneyCat, Ltd. v. PayPal, Inc.*, Case No. 14-cv-02490-JST (N.D. Cal.)). U.S. Patent No. 8,712,918 (the “918 patent”) is a continuation of U.S. Patent No. 8,195,578 (the “578 patent”). In CBM2014-00093, a proceeding in which I was admitted *pro hac vice* as backup counsel for the petitioner eBay Inc., the Board entered a final written

decision that claims 1-3, 5-11, and 13-23 of the 578 patent are unpatentable. Additionally, I was admitted *pro hac vice* as backup counsel for eBay in CBM2014-00091 and CBM2014-00092, concerning U.S. Patent Nos. 8,051,011 and 7,590,602, which are also related to the 918 patent. I am familiar with the subject matter at issue in this proceeding as a result of my representation of PayPal in the related pending litigation, my representation of eBay in CBM2014-00091, CBM2014-00092, and CBM2014-00093, and my representation of eBay in MoneyCat's appeal of the Board's final written decisions in those CBM proceedings to the Federal Circuit Court of Appeals (*see* Fed. Cir. Nos. 2016-1399, 2016-1405, and 2016-1408). I am familiar with the invalidity defenses raised and prior art asserted in the related pending litigation and in the related CBM proceeding, and am familiar with the prior art raised in this proceeding, including: Canadian Patent No. 2,221,399 ("Teramura"); Michael Peirce and Donal O'Mahony, "Scalable, Secure Cash Payment for WWW Resources With the PayMe Protocol Set," World Wide Web Journal, Nov. 1995, at 587-601 ("Peirce"); WIPO Pub. No. WO 97/19414 ("Haynes"); and U.S. Patent No. 5,715,402 ("Popolo"). I have reviewed the briefs and papers filed in this proceeding and in IPR2017-00541, CBM2014-00091, CBM2014-00092, CBM2014-00093, and CBM2017-00030.

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