

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

JUNIPER NETWORKS, INC.

Petitioner

v.

IMPLICIT, LLC

Patent Owner

Case: IPR2020-00587

Patent No. 9,591,104

**DECLARATION OF WILLIAM ELLSWORTH DAVIS, III
IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION**

I, William E. Davis, III, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the Bar of Texas.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never been denied an application for admission to practice before any court or administrative body.
4. No sanction or contempt citation has ever 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 set forth in 37 C.F.R. Part 42.

6. 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).

7. I am currently admitted *pro hac vice* before the Patent Trial and Appeal Board in *Sonos, Inc. v. Implicit, LLC*; IPR2018-00766 (Patent 7,391,791 B2) and *Sonos, Inc. v. Implicit, LLC* IPR2018-00767 (Patent 8,942,252 B2).

8. I am an experienced litigation attorney and have an established familiarity with the subject matter at issue in this proceeding. I have been practicing law since 2004 and have extensive experience litigating patent infringement cases in many different District Courts across the country. Among my experience in patent litigation matters, I have been lead counsel and counsel in multiple trials, *Markman* hearings, patent summary judgment proceedings, and other patent-related hearings and pleadings concerning, *inter alia*, patent validity and infringement issues.

9. I am familiar with U.S. Patent Nos. U.S. Patent Nos. 8,694,683 ("the '683 Patent"); 9,270,790 ("the '790 Patent"); 9,591,104 ("the '104 Patent"); 10,027,780 ("the '780 Patent"); 10,033,839; ("the '839 Patent") and 10,225,378 ("the '378 Patent"). I have been representing Patent Owner Implicit in pending District Court litigation against Petitioner asserting the '683, '790, '104, '780, '839

and '378 Patents. Among other things, I have been involved in the infringement, claim construction, and validity issues with regard to the '683, '790, '104, '780, '839 and '378 Patents.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of July, 2020, in Longview, Texas.

/s/ William E. Davis, III
William E. Davis, III