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Filed on behalf of Sony Interactive Entertainment LLC

By: Joseph F. Haag, Reg. No. 42,612
Wilmer Cutler Pickering Hale and Dorr LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Email: joseph.haag@wilmerhale.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Sony Interactive Entertainment LLC
Petitioner

v.

Intellectual Pixels Limited
Patent Owner

Case IPR2021-00237
U.S. Patent No. 10,681,109

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
JAMES M. DOWD**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 4 authorizing the parties to file motions for *pro hac vice* admissions under 37 C.F.R. § 42.10(c), Petitioner Sony Interactive Entertainment LLC (“Petitioner”) requests that the Patent Trial and Appeal Board (the “Board”) admit James M. Dowd *pro hac vice* in this proceeding, IPR2021-00237.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THE PROCEEDING

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. Section 42.10(c) indicates that “where lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize James M. Dowd *pro hac vice* in this proceeding.

1. Lead counsel, Joseph F. Haag, is a registered practitioner. Backup counsel, Daniel V. Williams, is also a registered practitioner.

2. Counsel, James M. Dowd, is an experienced litigator and has established familiarity with the subject matter at issue in the proceeding. Accompanying this motion as Exhibit 1022 is the January 19, 2021 Declaration of James M. Dowd in Support of this Motion for Admission *Pro Hac Vice* ("Dowd Decl."). In his declaration, Mr. Dowd asserts:

I am a member in good standing of the Virginia State Bar, the District of Columbia Bar, and the State Bar of California, and am admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the Federal Circuit, the Ninth Circuit, and the Fourth Circuit, and the United States District Courts for the Central District of California, the Northern District of California, the Southern District of California, the Eastern District of California, and the Eastern District of Virginia.

Dowd Decl. ¶ 3 (Ex. 1022). Mr. Dowd also asserts:

I am familiar with the subject matter at issue in this proceeding. I participated in the drafting of the Petition filed in this proceeding, and I have reviewed the papers filed in this proceeding. I am representing Petitioner Sony Interactive Entertainment LLC in multiple patent-related matters, including the following United States District Court cases: *Intellectual Pixels Limited v. Sony Interactive Entertainment*

LLC, No. 8:19-cv-01432-JVS-KES (C.D. Cal.), which is related to and involves a patent in the same family as the patent at issue in this proceeding; and *Intellectual Pixels Limited v. Sony Interactive Entertainment LLC*, No. 8:20-cv-01422-JVS-KES (C.D. Cal.), which is also related to and involves the same patent at issue in this proceeding.

Dowd Decl. ¶¶ 10-11 (Ex. 1022).

3. In his declaration, Mr. Dowd also attests to each of the listed items required by the “Order – Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639, Paper 7, as instructed in the Board’s “Notice of Filing Date Accorded to Petition and Time For Filing Patent Owner Preliminary Response” in this proceeding (Paper No. 4). *See* Dowd Decl. ¶¶ 1-11 (Ex. 1026).

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit James M. Dowd *pro hac vice* in this proceeding. The undersigned authorizes the Office to charge \$250 to Deposit Account No. 08-0219 for the fees set forth in 37 C.F.R. § 42.15(e) for this *pro hac vice* motion. Please charge any shortage of fees or credit any overpayments to the above Deposit Account.

Respectfully Submitted,

/Joseph F. Haag/

Joseph F. Haag, Reg. No. 42,612
Wilmer Cutler Pickering Hale & Dorr LLP

Dated: January 19, 2021

Table of Exhibits

Exhibit	Description
1001	U.S. Patent No. 10,681,109 (“109 patent”)
1002	Declaration of Dr. Henry Fuchs
1003	Declaration of Dr. Hall-Ellis
1004	U.S. Patent No. 6,409,602 (“Wiltshire”)
1005	U.S. Patent No. 6,404,817 (“Saha”)
1006	Chen, “The Development and Standardization of Asymmetrical Digital Subscriber Line,” IEEE Communications Magazine, May 1999 (“Chen”)
1007	PC Magazine, September 21, 1999 (“PC Magazine”)
1008	Baron et al., “MPEG Overview,” ITU/SMPTE Tutorial on Digital Terrestrial Broadcasting, January 1, 1994 (“Baron”)
1009	ITU-T Recommendation H.262 (“MPEG Standard”)
1010	Stay Order, Case No. 8:19-cv-01432-JVS-KES (C.D. Cal.), D.I.126
1011	Stay Stipulation, Case No. 8:19-cv-01432-JVS-KES (C.D. Cal.), D.I. 125
1012	<i>SPEX Techs., Inc. v. Kingston Tech. Corp.</i> , No. CV16-07349 JVS(AGRX), 2018 WL 2446801
1013	Scheduling Order, Case No. 8:20-cv-01422-JVS-KES (C.D. Cal.), D.I. 36
1014	In Re: Coronavirus Public Emergency Order Concerning Reopening of the Southern Division, C.D. Cal. General Order No. 20-12C.D. Cal. General Order 20-12

Case No. IPR2021-00237

Petitioner's Motion for Admission *Pro Hac Vice* of James M. Dowd

Exhibit	Description
1015	Order Regarding Motion to Dismiss, Case No. 8:20-cv-01422-JVS-KES (C.D. Cal.), D.I. 42.
1016	"Polygon-Assisted JPEG and MPEG Compression of Synthetic Images," by Marc Levoy ("Levoy")
1017	First Amended Complaint, Case No. 8:20-cv-01432-JVS-KES (C.D. Cal.), D.I. 69
1018	U.S. Patent No. 5,771,238 ("Sutton")
1019	"A G3 PowerPC™ Superscalar Low-Power Microprocessor," IEEE 1997 ("PowerPC")
1020	PC Magazine, April 23, 1996 ("1996 PC Magazine")
1021	U.S. Patent No. 6,434,695 ("Esfahani")
1022	Declaration of James M. Dowd in Support of this Motion for Admission <i>Pro Hac Vice</i>
1023	Declaration of S. Dennis Wang In Support of Motion For Admission <i>Pro Hac Vice</i>

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2021, I caused a true and correct copy of the foregoing materials:

- Petitioner's Motion For Admission *Pro Hac Vice* Of James M. Dowd
- Exhibit 1022
- Table of Exhibits (Ex. 1001-1023)

to be served via e-mail on the following attorneys for Patent Owner:

- doug.wilson@armondwilson.com
- michelle.armond@armondwilson.com
- forrest.mcclellen@armondwilson.com
- litigation@armondwilson.com

/Joseph F. Haag/
Joseph F. Haag
Reg. No. 42,612
Wilmer Cutler Pickering Hale and Dorr LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
650-858-6032