2UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.
Petitioners,

v.

MANUFACTURING RESOURCES INTERNATIONAL, INC.
Patent Owner

U.S. Patent No. 10,506,740

Title: CONSTRICTED CONVECTION COOLING SYSTEM FOR AN ELECTRONIC DISPLAY

Inter Partes Review No. IPR 2023-00254

PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION OF SRIKANTH K. REDDY UNDER 37 C.F.R. § 42.10(c)

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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §42.10(c) Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., (collectively, "Petitioners") respectfully request that the Board allow Srikanth K. Reddy to appear *pro hac vice* on its behalf in this proceeding, IPR2023-00254 regarding U.S. Patent No. 10,506,740 ("the '740 patent").

I. THE REQUEST IS TIMELY

Pursuant to the Board's "Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response," dated December 22, 2022 (Paper No. 4), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. §42.10(c), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., respectfully request that the Board allow Srikanth K. Reddy to appear *pro hac vice* on their behalf in this proceeding. Counsel for Patent Owner does not oppose the relief requested in this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37 C.F.R. § 42.10(c), the Petitioner has demonstrated good cause to admit Mr. Reddy *pro hac vice* in this proceeding. In particular, Petitioners' lead counsel is a registered practitioner, and Mr. Reddy is an experienced litigating attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty one days after service of the petition; includes a statement of facts showing good cause for the Board to recognize Mr. Reddy *pro hac vice*; and is being filed concurrently with Exhibit 1034, the Declaration of Srikanth K. Reddy in Support of Petitioner's Motion for *Pro Hac Vice* Admission of Srikanth K. Reddy under 37 C.F.R. § 42.10(c) ("Reddy Decl."), all in accordance with the "Order Authorizing Motion for *Pro Hac Vice* Admission" in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 at 3 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c) provides that "[t]he 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. For example, where the 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 showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding."

2. Sanjeet K. Dutta, lead counsel for Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.,. in this proceeding, is a registered practitioner holding Registration No. 46,145.

3. As set forth in the Reddy Declaration, Mr. Reddy is an experienced litigating attorney. Specifically, Mr. Reddy has been litigating patent cases for over 16 years. Mr. Reddy has been practicing law since 2007 and has extensive experience litigating patent infringement cases in district courts across the United States and before the Patent Trial and Appeal Board. Mr. Reddy's experience in patent litigation matters includes examining non-expert and expert witnesses and arguing Markman hearings, patent dispositive motion proceedings, and representing clients in other patent-related hearings and pleadings concerning, *inter alia*, patent validity and infringement issues. (Reddy Decl. ¶¶ 2–4).

4. Mr. Reddy's experience also includes practice before the Patent Trial and Appeal Board including the representation of a client in multiple IPR proceedings through trials to final written decisions. (Reddy Decl. ¶ 3).

5. Mr. Reddy also has an established familiarity with the precise subject matter at issue in this proceeding. In the course of this representation, he has developed a strong familiarity with the '740 patent, its prosecution history, the general subject matter to which the '740 patent is directed, and the prior art references relied upon by the Petitioners. (Reddy Decl., ¶ 6.) Additionally, Mr. Reddy has thoroughly reviewed the Petition and accompanying Exhibits submitted in this proceeding. *Id*.

6. Mr. Reddy has attested to each of the requirements set forth in paragraph 2(b)(i)-(viii) of the "Order Authorizing Motion for *Pro Hac Vice* Admission" in Case IPR2013-00639, Paper 7, at 3. (Reddy Decl. ¶¶ 7-11).

7. The Commissioner is hereby authorized to charge all fees due in connection with this *pro hac vice* application to Attorney Deposit Account 506989.

IV. CONCLUSION

In view of the foregoing, Petitioners respectfully submit that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and request an Order permitting Srikanth K. Reddy to appear *pro hac vice* on their behalf in this proceeding.

Dated: November 22, 2023

Respectfully submitted,

/Sanjeet K. Dutta/

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Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing **PETITIONERS' MOTION FOR PRO HAC VICE ADMISSION OF SRIKANTH K. REDDY UNDER 37 C.F.R. § 42.10(c) and Exhibit 1034** have been served on counsel for Patent Owner by email upon the following addresses as listed in Patent Owner's Mandatory Notices:

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Dated: November 22, 2023

/*Sanjeet K. Dutta*/

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