UNITED 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

Case IPR2023-00255

Patent 9,629,287

UNOPPOSED MOTION FOR ANDREA A. ANDERSON TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT OWNER MANUFACTURING RESOURCES INTERNATIONAL, INC.

LIST OF EXHIBITS

Exhibit	Description	Confidentiality Designation
2001	MRI-ITC-1331_0000435123-24 (4/24/2020 Romulus Stoain email to Dunn)	Filed Publicly
2002	MRI-ITC-1331_0000435125-27, Mutual Non-Disclosure Agreement	Filed Publicly
2003	MRI-ITC-1331_0000435133-34 (5/4/2020 Romulus Stoain email to Dunn)	Filed Publicly
2004	Intentionally Omitted	Filed Publicly
2005	Office Action mailed April 11, 2018, in Application No. 12/234,360	Filed Publicly
2006	Office Action mailed August 11, 2011, in Application No. 12/237,365	Filed Publicly
2007	Intentionally Omitted	Filed Publicly
2008	Decision Denying Institution of *Inter Partes* Review of U.S. Patent No. 8,854,572 in *Civiq Smartscapes LLC v. Manufacturing Resources International, Inc*., IPR2018-00774, Paper 6 (PTAB Sep. 25, 2018)	Filed Publicly
2009	Email Exchange Between Patent Owner and Petitioner Regarding Word Count	Filed Publicly
2010	Intentionally Omitted	
2011	Intentionally Omitted	
2012	MRI-ITC-1331_0000092739	Filed Publicly
2013	*Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331, Day 1 Public Hearing Tr. (June 26, 2023)	Filed Publicly
2014	Intentionally Omitted	
2015	Intentionally Omitted	
2016	*Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331, Transcript, Deposition of Chris Bolton (Feb. 23, 2023)	Filed Publicly
2017	Intentionally Omitted	
2018	Intentionally Omitted	
2019	Intentionally Omitted	
2020	Intentionally Omitted	
2021	Intentionally Omitted	

Exhibit	Description	Confidentiality Designation
2022	*Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331, Transcript, Deposition of Robert Smith-Gillespie (Feb. 20, 2023)	Filed Publicly
2023	*IP ratings*, *Int'l Electrotechnical Comm'n*, https://www.iec.ch/ip-ratings (last visited Aug. 29, 2023) ("IEC Standards")	Filed Publicly
2024	Declaration of Dr. Himanshu Pokharna ("Pokharna Dec.")	Filed Publicly
2025	Samsung White Paper: Taking the Message Outdoors (Dec. 4, 2015)	Filed Publicly
2026	Website - Samsung White Paper: Taking the Message Outdoors (Dec. 4, 2015) https://insights.samsung.com/2015/12/04/taking-the-message-outdoors-with-high-brightness-display-tech-white-paper/ (last visited Sept. 26, 2023)	Filed Publicly
2027	Respondents' Notice of Prior Art, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Jan. 4, 2023).	Filed Publicly
2028	Digital Solutions for Convenience Stores, Samsung, dated 2021	Filed Publicly
2029	Sung Ki Kim deposition transcript excerpts, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Mar. 31, 2023)	Filed Sealed in Its Entirety, Parties and Board Only
2030	Sungsu Lee deposition transcript excerpts, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Mar. 20, 2023)	Filed Sealed in Its Entirety, Parties and Board Only
2031	Wunkil Lee deposition transcript exerpts, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Mar. 21, 2023)	Filed Sealed in Its Entirety, Parties and Board Only
2032	John Palmer deposition transcript excerpts, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Mar. 16, 2023)	Filed Sealed in Its Entirety, Parties and Board Only

Exhibit	Description	Confidentiality Designation
2033	U.S. Patent Application Publication No. 2006/0077636 A1 to Kim, dated Apr. 13, 2006	Filed Publicly
2034	U.S. Patent Application Publication No. 2006/0132699 A1 to Cho et al., dated Jun. 22, 2006	Filed Publicly
2035	U.S. Patent No. 7,948,575 to Oh et al., dated May 24, 2011	Filed Publicly
2036	Certified translation of Korean Unexamined Patent Application KR 10-2006-0016469 to Na, dated Feb. 22, 2006 ("Na")	Filed Publicly
2037	U.S. Patent No. 7,800,706 B2 to Kim et al., dated Sep. 21, 2010)	Filed Publicly
2038	SEITC0027754 McDonald's Outdoor DMB presentation, dated Mar. 2017	Filed Sealed in Its Entirety, Parties and Board Only
2039	Infringement Claim Chart for U.S. Patent No. 9,629,287, Samsung OH46 / OH55	Filed Publicly
2040	Samsung OH product sales spreadsheet, CX-1728C	Filed Sealed in Its Entirety, Parties and Board Only
2041	SEITC0028579 Samsung Market Requirements Document, Outdoor LCD Signage, dated Apr. 23, 2021, and English translation	Filed Sealed in Its Entirety, Parties and Board Only
2042	SEITC0035224 Samsung teardown of Outdoor 86" product, dated Mar. 24, 2016, and English translation	Filed Sealed in Its Entirety, Parties and Board Only
2043	SEITC0035259 Samsung teardown photos of 55" product	Filed Sealed in Its Entirety, Parties and Board Only
2044	MRI-ITC-1331_0000046205 MRI Sales Detail	Filed Sealed in Its Entirety, Parties and Board Only

Exhibit	Description	Confidentiality Designation
2045	Declaration of Alan Brand, *Certain Outdoor and Semi-Outdoor Electronic Displays*, Inv. No. 337-TA-1331 (Aug. 19, 2022)	Filed Sealed in Its Entirety, Parties and Board Only
2046	MRI-ITC-1331_0000444713 MRI Sales Detail	Filed Sealed in Its Entirety, Parties and Board Only
2047	Article – Sunlight and Solar Clearing, https://lg-mri.com/sunlight-and-solar-clearing/ (last visited Sept. 26, 2023)	Filed Publicly
2048	Letter from Chris Bolton (Vertigo Group) to Bill Dunn (MRI), dated Apr. 6, 2009	Filed Sealed in Its Entirety, Parties and Board Only
2049	Trademark and Technology License Agreement, dated Feb. 18, 2014	Filed Sealed in Its Entirety, Parties and Board Only
2050	Joint Venture and Limited Liability Company Agreement, dated Jan. 8, 2014	Filed Sealed in Its Entirety, Parties and Board Only
2051	License Agreement, dated Aug. 27, 2008	Filed Sealed in Its Entirety, Parties and Board Only
2052	Confidential Agreement, dated Jan. 22, 2020	Filed Sealed in Its Entirety, Parties and Board Only
2053	Samsung Outdoor Installation Guide	Filed Publicly
2054	Claim Chart for U.S. Patent No. 9,629,287 and MRI's 55-inch and MRI's 75- and 86 inch Domestic Industry Products	Filed Publicly

Exhibit	Description	Confidentiality Designation
2055	*Apple iMac "PowerPC G3" 333MHz 1999 Specs,* Techable (last visited April 5, 2023), https://techable.com/apple/specs/imac-g3-333-mhzfruit-colors/	Filed Publicly
2056	U.S. Patent No. 8,373,841 ("'841 Patent")	Filed Publicly
2057	Declaration of Andrea A. Anderson in Support of Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission of Andrea A. Anderson Under 37 C.F.R. § 42.10(c)	Filed Publicly

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and the Board's authorization set forth in the Notice of Filing Date (Paper No. 4, at 2), Patent Owner Manufacturing Resources International, Inc, ("Patent Owner") respectfully requests that the Board admit Andrea A. Anderson *pro hac vice* in this proceeding as Back-Up Counsel. Patent Owner has met and conferred with Petitioners, and Petitioners do not oppose this motion.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c), 37 C.F.R., provides that:

> 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. 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.

The Board has further required that a motion for *pro hac vice* admission be filed in accordance with the "Order - Authorizing Motion for *Pro Hac Vice* Admission" entered in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) ("Unified Patents Order").

The Unified Patents Order requires that such motions: (1) "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel pro hac vice during the proceeding[;]" and (2) "[b]e accompanied by an affidavit or

declaration of the individual seeking to appear attesting to the following:"

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear has 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.;

vi. The individual will be subject to the U.S.P.T.O. 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);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration

of Andrea A. Anderson, submitted herewith as Exhibit 2057, Patent Owner requests the *pro hac vice* admission of Andrea A. Anderson in this proceeding:

1. Patent Owner's lead counsel, John C. Alemanni (the undersigned) is a registered practitioner (Reg. No. 47,384).

2. Ms. Anderson is an associate at the law firm of Kilpatrick Townsend & Stockton LLP. Ex. 2057 ¶ 8.

3. Ms. Anderson's practice with Kilpatrick Townsend & Stockton LLP has consisted almost exclusively of patent litigations and other patent related matters. *Id.* ¶ 9. Recent patent litigations where Ms. Anderson has been actively involved as patent litigation counsel include:

- *Components for Certain Environmentally-Protected LCD Digital Displays and Prods. Containing the Same*, Inv. 337-TA-1349 (ITC, filed Dec. 5, 2022)
- *Mfg. Res. Int'l, Inc. v. Samsung Elecs. Co., Ltd.*, 2-22-cv-00320 (E.D. Tex. Filed Aug. 19, 2022)
- *Certain Outdoor and Semi-Outdoor Elec. Displays, Prods. Containing the Same, and Components Thereof*, Inv. No. 337-TA-1331 (ITC, filed Aug. 19, 2022)
- *adidas AG v. Nike, Inc.*, 2-22-cv-00942 (E.D. Tex. filed June 10, 2022)
- *Certain Knitted Footwear*, Inv. No. 337-TA-1289 (ITC, filed Dec. 7, 2022)

- *Echologics LLC v. Orbis Inttelligent Sys., Inc.*, 3-21-cv-01147 (S.D. Cal. filed June 22, 2021)
- *Ultra-Mek, Inc. v. United Furniture Indus., Inc.*, 1-18-cv-00281 (M.D.N.C. filed Apr. 10, 2018)

5. Ms. Anderson has a deep familiarity with the subject matter at issue in this proceeding. *Id*. ¶ 11. Ms. Anderson is counsel for Patent Owner in the underlying International Trade Commission investigation, *Certain Outdoor and Semi-Outdoor Elec. Displays, Prods. Containing the Same, and Components Thereof*, Inv. No. 337-TA-1331 (ITC, filed Aug. 19, 2022). *Id.* Ms. Anderson was also significantly involved in the validity defense and drafting of the Patent Owner Response in this proceeding. *Id*. As such Ms. Anderson is intimately familiar with the Patent-at-Issue. *Id.* Ms. Anderson is also very familiar with the Petition, subsequent briefing, and the relevant art in this matter. *Id.*

6. Ms. Anderson is a member in good standing of the State Bar of North Carolina. *Id*. ¶¶ 1-2.

7. Ms. Anderson has never been suspended or disbarred from practice before any court or administrative body. *Id*. ¶ 3.

8. No application of Ms. Anderson for admission to practice before any court or administrative body has ever been denied. *Id*. ¶ 4.

9. No sanctions or contempt citations have ever been imposed against

Ms. Anderson by any court or administrative body. *Id*. ¶ 5.

10. Ms. Anderson has 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. Ex. 2057 ¶ 6.

11. Ms. Anderson understands that she will be subject to the U.S.P.T.O. 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). Ex. 2057 ¶ 7.

12. Ms. Anderson has not applied to appear *pro hac vice* in any other proceedings before the United States Patent and Trademark Office. *Id.* at ¶ 10.

IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF ANDREA A. ANDERSON.

The Board may recognize counsel *pro hac vice* 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. 37 C.F.R. § 42.10(c).

The facts outlined above in the Statement of Facts, and contained in the Declaration of Andrea A. Anderson (Ex. 2057), establish that there is good cause to admit Ms. Anderson *pro hac vice* in this proceeding. Patent Owner's lead counsel is a registered practitioner. Ms. Anderson has experience in various patent litigations. As counsel for Patent Owner in the underlying ITC Investigation, Ms. Anderson also has an established familiarity with the subject matter at issue, including the patent, petition, patent owner response, and references.

V. CONCLUSION

In view of the foregoing, and having satisfied the requirements of 37 C.F.R. § 42.10(c), Patent Owner respectfully requests that the Board admit Ms. Anderson *pro hac vice* in this proceeding.

Dated: January 17, 2024

Respectfully submitted,

/John. C. Alemanni/
John C. Alemanni
Reg. No. 47,384
Lead Counsel for Patent Owner

KILPATRICK TOWNSEND & STOCKTON LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Tel: (919) 420-1700
Fax: (919) 420-1800
jalemanni@kilpatricktownsend.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below a copy of this **MOTION FOR ANDREA A. ANDERSON TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT OWNER MANUFACTURING RESOURCES INTERNATIONAL, INC.** together with Exhibit 2057, were served on Petitioners by filing through the P-TACTS System, as well as by delivering a copy via electronic mail to the following:

Sanjeet Dutta – sdutta@goodwinlaw.com
Douglas J. Kline – dkline@goodwinlaw.com
Srikanth Reedy – sreddy@goodwinlaw.com
Naomi L. Birbach – nbirbach@goodwinlaw.com

Dated: January 17, 2024

Respectfully submitted,

/John C. Alemanni/
John C. Alemanni
Reg. No. 47,384
Lead Counsel for Patent Owner