

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner,

v.

NEO WIRELESS,
Patent Owner.

Cases IPR2022-01537, IPR2022-01539, IPR2022-01567, IPR2023-00426
Patents 10,075,941, 10,965,512, 10,447,450, 8,467,366

FORD MOTOR COMPANY,
Petitioner,

v.

NEO WIRELESS LLC
Patent Owner.

Cases IPR2023-00763, IPR2023-00764, IPR2023-00765, IPR2023-00766
Patents 10,447,450, 10,965,512, 10,833,908, 10,075,941

AMERICAN HONDA MOTOR CO., INC.,
Petitioner,

v.

NEO WIRELESS LLC
Patent Owner.

Cases IPR2023-00790, IPR2023-00791, IPR2023-00793, IPR2023-00794,
IPR2023-00797
Patents 8,467,366, 10,075,941, 10,447,450, 10,833,908, 10,771,302

GENERAL MOTORS LLC, NISSAN NORTH AMERICA, INC., TESLA, INC.,
AND AMERICAN HONDA MOTOR CO., INC.,
Petitioner,

v.

NEO WIRELESS LLC
Patent Owner.

Case IPR2023-00961
Patent 10,965,512

GENERAL MOTORS LLC AND NISSAN NORTH AMERICA, INC.,
Petitioner,

v.

NEO WIRELESS LLC
Patent Owner.

Case IPR2023-00962
Patent 10,447,450

GENERAL MOTORS LLC, NISSAN NORTH AMERICA, INC., AND TESLA
INC.,
Petitioner,

v.

NEO WIRELESS LLC
Patent Owner.

Cases IPR2023-00963, IPR2023-00964
Patents 10,447,450, 10,075,941

**DECLARATION OF XU ZHOU
IN SUPPORT OF PATENT OWNER'S
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION
OF XU ZHOU UNDER 37 C.F.R. § 42.10(c)**

I, Xu Zhou, declare as follows:

1. I am an attorney licensed to practice law in the State of Texas.
2. I am a member in good standing in all jurisdictions where I have been admitted to practice.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application denied for admission to practice before any court or administrative body.
5. I have never had any sanctions or contempt citations imposed upon me by any court or administrative body.
6. 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.
7. I agree to 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).
8. I am an associate at the law firm of Caldwell Cassady Curry PC.
9. I have practiced law in Texas since 2020, and the majority of my practice has consisted of patent related matters such as patent litigations.
10. My experience in patent litigations includes drafting pleadings and motions, taking and defending depositions, attending hearings and trials, leading

meet and confers, etc. Representative matters in which I am or was actively involved include:

- *VirnetX Inc. et al. v. Apple Inc.*, No. 6:12-cv-00855 (E.D.T.X.)
- *Match Group, LLC v. Bumble Trading Inc.*, No. 6:18-cv-00080 (W.D.T.X.)
- *Huawei Technologies Co. Ltd. v. Verizon Communications Inc. et al.*, No. 2:20-cv-00030 (E.D.T.X.)
- *Neo Wireless, LLC v. Dell Technologies Inc. et al.*, No. 6:21-cv-00024 (W.D.T.X.)
- *In re Neo Wireless, LLC Patent Litigation*, No. 2:22-md-03034 (E.D.M.I.)
- *Nanoco Technologies Ltd. v. Samsung Electronics Co. et al.*, No. 2:20-cv-00038 (E.D.T.X.)
- *BeSang Inc. v. Micron Technology, Inc. et al.*, No. 2:23-cv-00028 (E.D.T.X.)
- *BeSang Inc. v. Intel Corporation*, No. 3:23-cv-00113 (D. Or.)

11. I have currently or previously appeared in the following matters:

- *Huawei Technologies Co. Ltd. v. Verizon Communications Inc. et al.*, No. 2:20-cv-00030 (E.D.T.X.)

- *Neo Wireless, LLC v. Dell Technologies Inc. et al.*, No. 6:21-cv-00024 (W.D.T.X.)
- *BeSang Inc. v. Micron Technology, Inc. et al.*, No. 2:23-cv-00028 (E.D.T.X.)
- *BeSang Inc. v. Intel Corporation*, No. 3:23-cv-00113 (D. Or.)

12. I have not applied to appear *pro hac vice* in any other proceedings before the U.S.P.T.O. in the last three years.

13. I have an established familiarity with the subject matter at issue in the following pending IPR proceedings involving my client Neo Wireless LLC and U.S. Patent No. 10,075,941. I have reviewed the 10,075,941 Patent, as well as the Petitions and the relevant art in the matters involving that Patent, IPR2022-01537, IPR2023-00766, IPR2023-00791, and IPR2023-00964. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

14. I have an established familiarity with the subject matter at issue in the following pending IPR proceedings involving my client Neo Wireless LLC and U.S. Patent No. 10,965,512. I have reviewed the 10,965,512 Patent, as well as the Petitions and the relevant art in the matters involving that Patent, IPR2022-01539, IPR2023-00764, and IPR2023-00961. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

15. I have an established familiarity with the subject matter at issue in the following pending IPR proceedings involving my client Neo Wireless LLC and U.S. Patent No. 10,447,450. I have reviewed the 10,447,450 Patent, as well as the Petitions and the relevant art in the matters involving that Patent, IPR2022-01567, IPR2023-00763, IPR2023-00793, IPR2023-00962, and IPR2023-00963. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

16. I have an established familiarity with the subject matter at issue in the following pending IPR proceedings involving my client Neo Wireless LLC and U.S. Patent No. 8,467,366. I have reviewed the 8,467,366 Patent, as well as the Petitions and the relevant art in the matters involving that Patent, IPR2023-00426 and IPR2023-00790. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

17. I have an established familiarity with the subject matter at issue in the following pending IPR proceedings involving my client Neo Wireless LLC and U.S. Patent No. 10,833,908. I have reviewed the 10,833,908 Patent, as well as the Petitions and the relevant art in the matters involving that Patent, IPR2023-00765 and IPR2023-00794. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

18. I have an established familiarity with the subject matter at issue in the following pending IPR proceeding involving my client Neo Wireless LLC and

U.S. Patent No. 10,771,302. I have reviewed the 10,771,302 Patent, as well as the Petition and the relevant art in the matter involving that Patent at issue and Neo Wireless LLC, IPR2023-00797. I am also representing Neo Wireless LLC in district court proceedings involving that Patent.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true. and further that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.



Xu Zhou
CALDWELL CASSADY CURRY PC

Date: August 24, 2023