

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
Petitioner,

v.

SONRAI MEMORY LIMITED,
Patent Owner.

Case IPR2023-00909
Patent 6,724,241

**PETITIONER’S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF DANIEL H. WADE UNDER 37 C.F.R. § 42.10(c)**

PETITIONER’S UPDATED EXHIBIT LIST

- EX-1001 U.S. Patent No. 6,724,241 to Bedarida et al. (“’241 Patent”)
- EX-1002 Excerpts from the Prosecution History of the ’241 Patent
- EX-1003 Declaration of Dr. James Dickens
- EX-1004 Curriculum vitae of Dr. James Dickens
- EX-1005 U.S. Patent No. 5,872,733 to Buti et al. (“Buti”)
- EX-1006 U.S. Patent No. 4,769,784 to Doluca et al. (“Doluca”)
- EX-1007 U.S. Patent No. 6,404,274 to Hosono et al. (“Hosono”)
- EX-1008 U.S. Patent No. 6,424,570 to Le et al. (“Le”)
- EX-1009 Japanese Patent Application No. S61-024094 to Ujiie et al. (“Ujiie”)
- EX-1010 U.S. Patent No. 6,091,613 to Yang et al. (“Yang”)
- EX-1011 U.S. Patent No. 6,373,325 to Kuriyama et al. (“Kuriyama”)
- EX-1012 U.S. Patent No. 4,506,350 to Asano et al. (“Asano”)
- EX-1013 District Court’s Claim Construction Order in *Sonrai Memory Limited v. Kioxia et al.*, Dkt. 55, W.D. Tex. 6:21-cv-00400-ADA
- EX-1014 Webster’s Unabridged Dictionary, 2d ed. 2001 (excerpts)
- EX-1015 McGraw-Hill Electronics Dictionary, 6th ed. 1997 (excerpts)
- EX-1016 U.S. District Courts–Combined Civil and Criminal Federal Court Management Statistics (September 30, 2022), available at:
https://www.uscourts.gov/sites/default/files/data_tables/cms_na_distprofile0930.2022.pdf
- EX-1017 Geiger *et al.*, VLSI Design Techniques for Analog And Digital Circuits (1990), ISBN 0070232539 (excerpts)

- EX-1018 Plaintiff's Sur-Reply Claim Construction Brief in *Sonrai Memory Limited v. Apple Inc.*, Dkt. 48, W.D. Tex. 6:22-cv-00787-ADA
- EX-1019 Texas Instruments, *SNx4LS24x, SNx4S24x Octal Buffers and Line Drivers With 3-State Outputs* (Apr. 1985, rev. Oct. 2016)
- EX-1020 District Court's Claim Construction Order in *Sonrai Memory Limited v. Apple Inc.*, Dkt. 53, W.D. Tex. 6:22-cv-00787-ADA
- EX-1021 Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation, Katherin K. Vidal (USPTO June 21, 2022) ("Interim Guidance")
- EX-1022 Stipulation
- EX-1023 Supplemental Declaration of Dr. James Dickens
- EX-1024 Deposition Transcript of Dr. Michael Brogioli
- EX-1025 Declaration of Daniel H. Wade in support of Motion for *Pro Hac Vice* Admission

Pursuant to 37 C.F.R. § 42.10(c), Petitioner, Micron Technology, Inc., (“Petitioner” or “Micron”) respectfully requests that the Board recognize Daniel H. Wade as counsel *pro hac vice* in this proceeding. Micron seeks the counsel of Daniel H. Wade due to his experience in representing Micron in other patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on June 9, 2023.

Counsel for Petitioner conferred with counsel for Patent Owner prior to filing this motion, and Patent Owner does not oppose this motion. The oral hearing is currently scheduled for August 28, 2024.

I. Statement of Facts

Daniel H. Wade is a patent litigation attorney with 3 years of experience representing clients in cases involving, *inter alia*, electrical and computer technologies, trade secret litigation, and privacy and data security. Mr. Wade has experience in all aspects of complex intellectual property litigation in both U.S. District Courts and the U.S. International Trade Commission, including pre-suit diligence, fact and expert discovery, claim construction, and motion practice. Mr. Wade’s biography is attached as Appendix A of Exhibit EX-1025.

Mr. Wade also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding. Mr. Wade has extensively reviewed U.S. Patent No. 6,724,241, its prosecution history, relevant prior art, the Petition for IPR (including the invalidity grounds therein, and the cited references), and all exhibits filed in this case.

II. Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Daniel H. Wade.

Accordingly, Petitioner submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Daniel H. Wade as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Date: August 7, 2024

/Timothy W. Riffe/

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4) and 42.205(b), the undersigned certifies that on August 7, 2024, a complete and entire copy of this Petitioner's Motion for *Pro Hac Vice* Admission of Daniel H. Wade and Exhibit 1025 were provided via email, to the Patent Owner by serving the email correspondence addresses of record as follows:

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