UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MANUFACTURING RESOURCES INTERNATIONAL, INC.,
Petitioner,

v.

SAMSUNG ELECTRONICS CO., LTD,
Patent Owner

U.S. Patent No. 8,842,253

Case No. IPR2023-01203

PATENT OWNER'S 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) Patent Owner Samsung Electronics Co., Ltd. respectfully request that the Board allow Srikanth K. Reddy to appear *pro hac vice* on its behalf in this proceeding, IPR2023-01203 regarding U.S. Patent No. 8,842,253 ("the '253 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 August 11, 2023 (Paper No. 5), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. §42.10(c), Patent Owner Samsung Electronics Co., Ltd. respectfully request that the Board allow Srikanth K. Reddy to appear *pro hac vice* on their behalf in this proceeding. Counsel for Petitioner 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 Patent Owner has demonstrated good cause to admit Mr. Reddy *pro hac vice* in this proceeding. In particular, Patent Owner's 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 2010 the Declaration of Srikanth K. Reddy in Support of Patent Owner'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. Linnea Cipriano, lead counsel for Patent Owner Samsung Electronics Co., Ltd. in this proceeding, is a registered practitioner holding Registration No. 67,729.

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 '253 patent, its prosecution history, the general subject matter to which the '253 patent is directed, and the prior art references relied upon by the Petitioners. (Reddy Decl., ¶ 6.) Additionally, Mr. Reddy has thoroughly reviewed the Petition, Patent Owner's Preliminary Response 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, Patent Owner respectfully submits 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.

Respectfully submitted,
GOODWIN PROCTER LLP

Date: April 30, 2024

By: */Linnea Cipriano/*

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing **PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF SRIKANTH K. REDDY UNDER 37 C.F.R. § 42.10(c) and Exhibit 2010** have been served on counsel for Petitioner by email upon the following addresses:

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Respectfully submitted,
GOODWIN PROCTER LLP

Date: April 30, 2024

By: */Linnea Cipriano/*

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