

[REDACTED]

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,
Petitioner,

v.

PANTECH WIRELESS, LLC,
Patent Owner.

IPR2023-01267 (Patent 9,313,809 B2)
IPR2023-01268 (Patent 9,575,631 B2)
IPR2023-01269 (Patent 9,854,545 B2)
IPR2023-01270 (Patent 10,869,247 B2)
IPR2023-01272 (Patent 9,065,486 B2)
IPR2023-01273 (Patent 9,136,924 B2)

**DECLARATION OF SOO HONG IN SUPPORT OF
MOTION TO DISQUALIFY MAYER BROWN**

[REDACTED]
Hong Decl. - IPR2023-01267, -01268, -01269, -01270, -01272, -01273

1. My name is Soo A. Hong. I am a partner at the law firm of Lee, Hong,
Degerman, Kang & Waimey. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] I submit this declaration in support of Petitioner LG
Electronics, Inc.'s ("LGE") Motion to Disqualify Mayer Brown LLP ("Motion") in
the above-captioned IPRs ("LGE-Pantech IPRs").

2. I previously submitted declarations as part of the dispute between the
patent owners in the above-captioned IPR proceedings, Pantech Corporation and
Pantech Wireless, LLC (collectively, "Pantech"), and LGE. Specifically, I submitted
declarations in connection with LGE's Motion to Disqualify Mayer Brown LLP on
December 29, 2022, and [date] in the parallel district court proceeding, *Pantech
Corporation et al. v. LG Electronics Inc. et al.*, No. 5:22-cv-00113-RWS-JBB (E.D.
Tex.) ("Texas Case"). That case involves the same U.S. Patent Nos. 9,136,924;
9,854,545; 10,869,247; 9,313,809; 9,065,486; and 9,575,631 that are at issue in the
LGE-Pantech IPRs (the "Challenged Patents").

3. [REDACTED], my firm has worked with several of the attorneys currently at Mayer Brown who have appeared as counsel for Pantech in the above-captioned IPRs or the related Texas Case. This work with Pantech's counsel took place both when certain current Mayer Brown attorneys were previously affiliated with Steptoe & Johnson LLP, as well as after these attorneys became affiliated with Mayer Brown LLP. The work I did with these attorneys took place as part of their representation of LGE in several different matters, including the following four matters (collectively, the "LGE Matters"):

- *Integrated Circuit Devices and Products Containing the Same*, ITC-337-TA-873 ("Tela");
- *Cellular Comm's. Equip. v. LG Electronics*, Nos. 6:13-cv-00508, 6:14-cv-00982, 6:16-cv-00365 (E.D. Tex.) ("CCE");
- *Jenam Tech, LLC v. LG Electronics, Inc.*, No. 4:19-cv-00249 (E.D. Tex.) ("Jenam"); and

[REDACTED]
[REDACTED]
[REDACTED]
4. I am familiar with the documents provided to Mayer Brown in connection with the LGE Matters and am prepared to testify about them if asked to do so.

5. I personally communicated with Mayer Brown's attorneys in their role as LGE's counsel in several matters (the "Mayer Brown LGE Attorneys"), including at least in *Jenam*, *CCE*, and [REDACTED] matters. I am also personally aware, through my communications with members of the Mayer Brown team, that other attorneys representing Pantech adverse to LGE were directly involved in representing LGE in one or more of the LGE Matters.

6. [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

7. Upon receiving document production requests and/or interrogatories or specific requests from the Mayer Brown LGE Attorneys, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8. During the document collection process for each of the LGE Matters, I and my team regularly communicated with the Mayer Brown LGE Attorneys

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

9. In some instances, in connection with the LGE Matters, LGE provided to me certain documents with privileged information. The privileged information in those documents would have been shared with the Mayer Brown LGE Attorneys, before being redacted from the produced version of the document. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10. In certain matters, including at least the *CCE* matters, I also provided Mayer Brown LGE Attorneys [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

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[illegible]

[REDACTED] Mayer Brown LGE Attorneys served as
counsel to LGE in the *CCE* matter and [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Except for user guides, the materials I collected for the *CCE* matter, including [REDACTED], contains LGE's highly confidential and proprietary information. Mayer Brown had access to those materials in their capacity as trial counsel during the course of the *CCE* matter.

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

13. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

14. Other specific examples LGE confidential information that Mayer Brown possessed as a result of the *CCE* case is financial and marketing data for LGE products accused of infringing the Challenged Patents in the Texas Case. Mayer Brown both requested and received confidential financial and marketing for LGE's

[REDACTED]

[REDACTED]
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products during its past representations. For example, as part of the *CCE* case, [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

15. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

16. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] The information contained in those [REDACTED] pertains to device features implemented in hardware, and directly relates to hardware features accused of infringing the Challenged Patents. For example, asserted claims of the '545 patent include a transceiver, a controller, and various features thereof. Asserted claims of the '247 patent recite a transceiver, a processor, and various features thereof. Additionally, asserted claims 6-10 of the '809 patent recite a transmitter, a processor, and particular features thereof. Other documents provided to Mayer Brown, [REDACTED]

[REDACTED]
[REDACTED]
18. [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

19. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
20. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

21. Additionally, in the [REDACTED] matter, I collected [REDACTED]
[REDACTED]
[REDACTED] These

materials collectively included highly confidential, proprietary, and sensitive
information regarding [REDACTED]
[REDACTED] [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. Mayer Brown had access to those materials in their capacity as trial counsel during the course of the [REDACTED] matter.

22. As another example of confidential information that Mayer Brown possessed, [REDACTED]

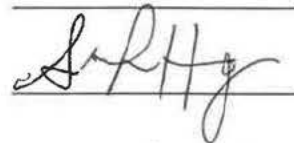
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
23. Because of the similar products and technology involved, the materials collected for the Texas Case have overlapped with at least some of the confidential materials collected in the past litigations where Mayer Brown represented LGE.

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 were 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.

Executed on:

11/21/2023

By:



Soo Hong