

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

Case IPR2023-01360
Patent 9,609,544 B2

**PATENT OWNER HEADWATER RESEARCH LLC'S MOTION
FOR PRO HAC VICE ADMISSION OF JAMES PICKENS**

Patent Owner, Headwater Research LLC, hereby requests that the Board recognize James Pickens as counsel *pro hac vice* for this proceeding under 37 C.F.R. § 42.10(c).

I. Statement Of Facts

As required by § 42.10(c), the following statement of facts demonstrates that there is good cause for the Board to recognize Mr. James Pickens *pro hac vice*.

Mr. Pickens is an experienced patent litigation attorney. Mr. Pickens (CA SBN 307474) has practiced patent litigation since 2016. He has experience litigating numerous patent litigation matters before U.S. district courts and the U.S. International Trade Commission (“ITC”), including several jury trials. U.S. Patent No. 9,609,544 and other patents are currently asserted by Patent Owner in pending district court litigation against Petitioner. Mr. Pickens is among the principal attorneys responsible for the representation of Patent Owner in those co-pending litigations. Through his role as attorney in the co-pending litigations, he has an established familiarity with the subject matter at issue in this IPR proceeding. He is heavily involved with issues such as claim construction and invalidity present in those litigations, many of which overlap with the issues presented in this IPR proceeding. Patent Owner has expended significant resources in the co-pending litigation with Mr. Pickens as counsel, and it wishes to continue using him as counsel in this IPR proceeding.

Patent Owner has executed a Power of Attorney authorizing Mr. Pickens to serve as backup counsel in this IPR proceeding, which is being filed concurrently.

Petitioner Samsung indicated that it does not oppose this motion.

II. Declaration Of Individual Seeking To Appear

This Motion for Pro Hac Vice admission is accompanied by declaration of Mr. Pickens attesting to the facts required by the Board in *Unified Patents, Inc. v. Parallel Iron, LLC*, No. IPR2013-00639 (P.T.A.B. Oct. 15, 2013) (Paper 7).

Respectfully submitted,

Date: June 7, 2024

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Counsel for Patent Owner

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on June 7, 2024, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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