

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Amazon.com, Inc. and Amazon Services LLC,
Petitioners

v.

LightGuide, Inc.,
Patent Owner.

Case IPR2023-01423
Patent No. 10,528,036

**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO 37 C.F.R. §42.10(c)**

Patent Owner LightGuide, Inc. (“LightGuide”) respectfully requests that the Board recognize Richard S. Florsheim as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Patent Owner’s Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the “Order—Authorizing Motion for *Pro Hac Vice* Admission” in Case No. IPR2013-00639, Paper 7 (MPT) [“the Order”]. In particular, this motion for *pro hac vice* Admission is being filed no sooner than twenty one (21) days after service of the Petition in this IPR.

Further, this motion is authorized by the Notice of Filing Date Accorded To Petition and Time For Filing Patent Owner Preliminary Response (Paper 3).

II. STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Florsheim *pro hac vice*.

Mr. Florsheim is an experienced patent litigation attorney and is engaged as outside counsel for LightGuide in the parallel *LightGuide, Inc. v. Amazon.com, Inc.* district court case in the Eastern District of Texas. Mr. Florsheim has been substantively involved in the analysis of the petition filed in this IPR.

Because Mr. Florsheim is an experienced practitioner with an established familiarity with the subject matter of this proceeding, Patent Owner respectfully

submits that there is good cause for the Board to recognize Mr. Florsheim as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Richard Florsheim attached hereto as Attachment A as required by the Order.

Date: November 30, 2023

Respectfully submitted,

/Stephen T. Schreiner/
Stephen T. Schreiner
Reg. No. 43,097
Carmichael IP, PLLC

Counsel for Patent Owner

ATTACHMENT A

UNITED STATES PATENT AND TRADEMARK OFFICE

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**DECLARATION OF RICHARD S. FLORSHEIM IN SUPPORT OF
PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO 37 C.F.R. §42.10(c)**

I, Richard S. Florsheim, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the State Bars of Florida and Wisconsin.
2. I am presently practicing as a solo practitioner. I was formerly a partner in the Foley & Lardner law firm, where I headed up the firm's intellectual property practice. I have significant litigation experience in state and federal courts, including having served as lead counsel in over 50 patent infringement litigation matters and having argued over a dozen appeals in patent cases before the Court of Appeals for the Federal Circuit.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application for admission to practice before any court or administrative body denied.
5. I have never had any sanctions or contempt citations imposed on 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 title 37 of the Code of Federal Regulations.
7. I agree to be subject to the USPTO 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).

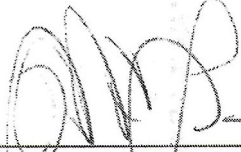
8. I have not applied to appear pro hac vice in any matter before the Board within the last three years.

9. LightGuide, Inc.'s lead counsel in this IPR proceeding, Mr. James T. Carmichael, is a Partner at Carmichael IP, PLLC, and is a registered practitioner experienced in proceedings before the USPTO.

10. I have worked with lead counsel and am familiar with the subject matter at issue in this proceeding. As such, I have reviewed and am very familiar with (i) U.S. Patent No. 10,518,036 (the "'036 patent"), the patent-at-issue in this proceeding, (ii) the prior art relied upon in Petitioner's Petition, (iii) the legal and factual arguments that have been addressed by Patent Owner, and (iv) the developments in this proceeding since the filing of Petitioner's Petition.

11. 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 knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both. (See 18 U.S.C. § 1001.)

Dated: 11/27/2023



Richard S Florsheim

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO 37 C.F.R. §42.10(c)**

The names and email addresses of the parties being served are as follows:

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Respectfully submitted,

/Stephen T. Schreiner/

Date: November 30, 2023