UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

PLR WORLDWIDE SALES LIMITED,
Petitioner

v.

FLIP PHONE GAMES, INC.,
Patent Owner

---

IPR No. IPR2024-00171

Patent No. 10,617,958

---

**MOTION FOR *PRO HAC VICE* ADMISSION**
**UNDER 37 C.F.R. § 42.10**

Patent Owner Flip Phone Games, Inc. ("Patent Owner") files this motion for *pro hac vice* admission under 37 C.F.R. § 42.10(c), as authorized in the Notice of Filing Date Accorded, Paper No. 3. The Board requires that such motions be filed in accordance with the "Order – Authorizing Motion for Pro Hac Vice Admission" in Case IPR2013-00639, Paper 7 ("Order"). Patent Owner respectfully requests that the Board recognize Steven D. Moore as counsel *pro hac vice* during this proceeding.

## 1. Time for Filing

This motion for *pro hac vice* admission is filed no sooner than twenty-one (21) days after service of the petition, as required by the Order.

## 2. Statement of Facts

The following statement of facts shows that there is good cause for the Board to recognize Mr. Moore *pro hac vice*.

Mr. Moore is an experienced litigation attorney and has been involved in numerous litigations involving patent infringement in District Courts across the country. Mr. Moore has experience in jury and bench trials, *Markman* hearings, and Federal Circuit oral arguments in patent infringement litigation as well as in proceedings before the Patent Trial and Appeal Board. Mr. Moore's biography is attached hereto as Exhibit 2007.

Mr. Moore is lead counsel for Flip Phone Games, Inc. in a district court litigation captioned *Flip Phone Games Inc. v. PLR Worldwide Sales Limited*, No.

2:23-cv-00139-JRG (E.D. Tex.) involving the same parties, in which the patents-at-issue in IPR2024-000132, IPR2024-000171, IPR2024-000200, and IPR2024-000209 are asserted. Patent Owner wishes to use Mr. Moore as counsel in this proceeding.

Further, counsel for Petitioner does not oppose Mr. Moore appearing *pro hac vice* during this proceeding.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Moore as counsel *pro hac vice* during this proceeding.

**3. <u>Affidavit or Declaration of Individual Seeking to Appear</u>**

This Motion for *Pro Hac Vice* Admission is accompanied by the declaration of Mr. Steven D. Moore, as required by authorization of the Board.

Dated: August 21, 2024

Respectfully submitted,

By: /*Michael T. Morlock*/
Michael T. Morlock
Reg. No. 62,245
Lead Counsel for Patent Owner

**DECLARATION OF MR. STEVEN D. MOORE IN**
**SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

I, Steven D. Moore, am over eighteen years of age and would be competent to testify as to the matters set forth herein if called upon to do so.

1. I have been practicing in the field of intellectual property, and particularly, patent litigation, for over 20 years, and over 25 years for litigation generally.

2. I am a member in good standing of the state bars of California, Georgia and North Carolina, as well as the following Federal Courts:

a. U.S. Court of Appeals for the Federal Circuit;

b. U.S. Court of Appeals for the Fourth Circuit;

c. U.S. District Court for the Northern District of California;

d. U.S. District Court for the Central District of California;

e. U.S. District Court for the Eastern District of California;

f. U.S. District Court for the Southern District of California;

g. U.S. District Court for the Eastern District of Texas;

h. U.S. District Court for the Western District of Texas;

i. U.S. District Court for the Eastern District of North Carolina;

j. U.S. District Court for the Middle District of North Carolina;

k. U.S. District Court for the Western District of North Carolina;

l. U.S. District Court for the Northern District of Georgia; and

m. U.S. District Court for the Middle District of Georgia.

3. I have not 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. No sanction or contempt citation has been imposed against 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 42 of 37 C.F.R.

7. I will 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. During the past (6) years I have applied to appear *pro hac vice* before the Board in six other proceedings: IPR2019-00083, IPR2019-00086, PGR2018-00029, PGR2018-00047, PGR2018-00055, and PGR2018-00091, in which I was admitted *pro hac vice* on behalf of patent owner.

9. I am familiar with the subject matter at issue in the proceeding. I am lead counsel for Flip Phone Games, Inc. in a district court litigation captioned *Flip Phone Games Inc. v. PLR Worldwide Sales Limited*, No. 2:23-cv-00139-JRG (E.D.

Tex.) involving the same parties.

10. I am an experienced litigation attorney, with experience in numerous litigations involving patent infringement in District Courts across the country. I have conducted both bench and jury trials, *Markman* hearings, and Federal Circuit oral arguments in patent infringement litigation matters. My biography is attached hereto as Exhibit 2007.

I declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: August 21, 2024

By: /s/ *Steven D. Moore*

Steven D. Moore
Kilpatrick Townsend & Stockton LLP Two Embarcadero Center, Suite 1900 San Francisco, CA 94111
Telephone: 415-273-4741
Facsimile: 415-651-8510

Counsel for Patent Owner Flip Phone Games, Inc.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for *Pro Hac Vice* Admission Under 37 C.F.R. § 42.10 has been served electronically via email upon the following:

jimglass@quinnemanuel.com
quincylu@quinnemanuel.com
ronhagiz@quinnemanuel.com
nimahefazi@quinnemanuel.com

Dated: August 21, 2024

By: */Michael T. Morlock/*
Michael T. Morlock
Reg. No. 62,245
Lead Counsel for Patent Owner