

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN PINCAN TECHNOLOGY CO., LTD.,

Petitioner,

v.

RIDGE WALLET, LLC,

Patent Owner.

Case IPR2024-00340

Patent 10,791,808 B2

PETITIONER'S MOTION FOR ADMISSION

***PRO HAC VICE* OF TIANYU JU**

The Petitioner respectfully requests that the Board recognize Ms. Tianyu Ju as counsel *pro hac vice* during this proceeding.

1. Time For Filing

This Motion for Admission *Pro Hac Vice* is being filed no sooner than twenty-one (21) days after service of the petition at January 2, 2024.

2. Statement of Facts

Based on the following facts, and supported by the Declaration of Tianyu Ju (Exhibit 1020), submitted herewith, Petitioner has established good cause for the Board to recognize Ms. Tianyu Ju *pro hac vice* in this proceeding:

Ms. Ju is an experienced litigation attorney in District Court cross the country, before the International Trade Commission, and at the Court of Appeals for the Federal Circuit. She has been involved in numerous litigations involving patent infringement across the country.

More specifically, She is an attorney at the firm of Glacier Law LLP and a member in good standing of the State Bar of California. Her State Bar Number in California is CA SBN 323,817. Tianyu Ju Declaration at ¶¶ 1-2.

Additionally, she has not been suspended or disbarred from practice before any court or administrative body. And she has never had an application for admission to practice before any court or administrative body denied. And no sanction or contempt citation has been imposed against her by any court or administrative body. *Id.* at ¶¶ 3-5.

Additionally, she has 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 Code of Federal Regulations. And she acknowledges that she will be subject to the U.S. Patent and Trademark Office Rules of Professional Conduct set forth in 37 C. F. R. § § 11.101, et seq. and to the Office's disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* at ¶¶ 6-7.

Additionally, although she has not applied to appear *pro hac vice* before the Office in any other proceeding in the last three (3) years, she is an experienced litigation attorney, with experience in numerous litigations involving patent infringement in District Courts across the country. U.S. Patent No. 10,791,808 is currently asserted against Petitioner SHENZHEN PINCAN TECHNOLOGY CO., LTD. in two co-pending litigations, THE RIDGE WALLET LLC v. SHENZHEN PINCAN V. TECHNOLOGY CO., LTD. D/B/A ARW-WALLET. Case No. 2:23-cv-00392 and Certain Compact Wallets and Components Thereof. Case No.337-TA-1355 ("the co-pending litigations"). Ms. Ju has been involved in all aspects of the representation of Petitioner in the co-pending litigations and, as such, has an established familiarity with the subject matter at issue in this proceeding. She has been involved with issues such as claim construction, prior arts and invalidity present in those litigations, many of which overlap with the issues presented in this IPR proceeding. Petitioner has expended significant resources in the co-pending litigations with Ms. Ju as counsel, and it wishes to continue using

her as counsel in this IPR proceeding. *Id.* at ¶¶ 8-9.

Further, counsel for Patent Owner does not oppose Ms. Ju appearing *pro hac vice* during this proceeding.

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Ms. Ju as counsel *pro hac vice* during this proceeding.

3. Affidavit or Declaration of Individual Seeking to Appear

This Motion for Admission *Pro Hac Vice* is accompanied by a declaration of Ms. Ju as required by the NOTICE OF FILING DATE ACCORDED TO PETITION AND TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE entered January 18, 2024.

For the foregoing reasons, Petitioner submits that there is good cause for the Board to recognize Ms. Ju as counsel *pro hac vice* in this proceeding.

Dated: March 15, 2024

Respectfully submitted

/s/ Xiaofang Zhong

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CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on March 15, 2024, a true and correct copy of the foregoing was served via electronic mail upon counsel of record for the Patent Owner at the following email addresses:

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