

IPR2024-00343

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED and
SAMSUNG ELECTRONICS CO., LTD.

Petitioners

v.

NETWORK SYSTEM TECHNOLOGIES, LLC

Patent Owner

U.S. Patent No. 7,594,052

Inter Partes Review No. IPR2024-00343

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION
OF PETER C. KRUSIEWICZ UNDER 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10 and the authorization provided by the Board in Paper 4 dated December 27, 2023 (“the Notice”), Patent Owner Network System Technologies, LLC (“Patent Owner”) submits this unopposed motion for Peter C. Krusiewicz to appear *pro hac vice*. Patent Owner respectfully requests for the Board to recognize Mr. Krusiewicz as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so.

I. Timing

Pursuant to the authorization provided in the Notice, this motion for *pro hac vice* admission is being filed no sooner than twenty-one days after service of the Petition.

II. Statement of Facts

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Krusiewicz *pro hac vice*.

Patent Owner’s lead counsel for this proceeding, Jennifer Hayes, is a registered practitioner (Reg. No. 50,845).

Mr. Krusiewicz is an experienced litigation attorney with nearly two (2) years of patent litigation experience in district courts. Ex. 2029 at ¶ 8.

Mr. Krusiewicz is counsel for Patent Owner in the district court litigation (*Network System Technologies, LLC v. Qualcomm Incorporated and Qualcomm Technologies, Inc.*, No. 1:22-cv-01331-DAE (W.D. Tex.)) where the ‘052 patent is

asserted against one of the Petitioners. Mr. Krusiewicz has reviewed and is familiar with the '052 patent and the issues raised in the Petition in this proceeding. *Id.* at ¶ 9.

Mr. Krusiewicz is a member in good standing in the State Bar of Illinois and the U.S. District Court for the Northern District of Illinois. *Id.* at ¶ 1.

Mr. Krusiewicz has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. *Id.* at ¶¶ 2-4.

Mr. Krusiewicz 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 of the C.F.R. and agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. 11.19(a). *Id.* at ¶¶ 5-6. Mr. Krusiewicz has not appeared *pro hac vice* before the Office in the last three years. *Id.* at ¶ 7.

Patent Owner seeks to have Mr. Krusiewicz participate in the deposition of Petitioner's expert and other witnesses.

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

III. Statement of Facts

This Motion is accompanied by the Declaration of Mr. Krusiewicz. Ex. 2058.

Respectfully submitted,

Dated: July 18, 2024

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Motion for *Pro Hac Vice* Admission of Peter C. Krusiewicz under 37 C.F.R. § 42.10 together with all exhibits filed therewith was served on July 18, 2024, upon the following parties via electronic service:

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