UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRANSCORE, LP

Petitioner,

v.

HAND HELD PRODUCTS, INC.,

Patent Owner

Case IPR2024-00391

Patent 8,141,784

PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF ZACHARY M. COOTS

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent 8,141,784 to Wang, et al. ("the '784 patent").
1002	File History for U.S. Patent 8,141,784
1003	Declaration of Daniel W. Engels, Ph.D
1004	Curriculum Vitae of Daniel W. Engels, Ph.D
1005	U.S. Patent Publication 2010/0056200 to Tolonen ("Tolonen")
1006	David Katz, et al., "Fast, Versatile Blackfin® Processors Handle Advanced RFID Reader Applications," Analog Dialogue 40-09 (Sept. 2006).
1007	Analog Devices, Blackfin Embedded Processor, ADSP-BF531/ADSP-BF532 (Aug. 2006) ("ADSP-BF531 Data Sheet")
1008	Analog Devices, Blackfin Embedded Symmetric Multiprocessor, ADSP-BF561 (May 2006) ("ADSP-BF561 Data Sheet")
1009	Analog Devices, "Mixed-Signal Front-End (MxFe) Baseband Transceiver for Broadband Applications," AD9861 (Nov. 2003) ("AD9861 Data Sheet")
1010	U.S. Patent Publication 2010/0020763 A1 to Ishizu, et al. ("Ishizu")
1011	Tuttlebee, Baseband Technology for 3G Handsets and Basestations (Wiley 2004) ("Tuttlebee II")
1012	Tuttlebee, Enabling Technologies (Wiley 2002) ("Tuttlebee I")
1013	McGraw-Hill, Dictionary of Scientific and Technical Terms (5th ed. 1994)
1014	Analog Devices, Blackfin Embedded Processor, ADSP-BF536 (Apr. 2006) ("ADSP-BF536 Data Sheet")
1015	Atheros, AR5007EG Single-chip IEEE 802.11b/g WLAN solution
1016	Atheros Communications, Press Release: Atheros Launches the World's Most-Integrated, Single-Chip 802.11g Solution for PCI Express (Dec. 5, 2006)
1017	ISO/IEC 15693-3 First Edition (2001)
1018	EPCglobal, Radio-Frequency Identify Protocols Class-1 Generation-2 UHF RFID Protocol for Communications at 860 MHz–960 MHz version 1.1.0 (2005)

Exhibit	Description
1019	Declaration of Zachary M. Coots in support of Motion to Appear pro hac vice

Pursuant to 37 C.F.R. § 42.10(c), Petitioner, TransCore, LP ("Petitioner") respectfully requests the *pro hac vice* admission of attorney Zachary Coots for the purposes of the above-captioned *inter partes* review proceeding. Patent Owner has conferred with counsel for Hand Held Products, Inc. ("Patent Owner"), and Patent Owner does not oppose this motion.

I. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE ZACHARY M. COOTS *PRO HAC VICE* IN THIS PROCEEDING

The Board may recognize counsel *pro hac vice* during an *inter partes* review proceeding upon a showing of good cause, "subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose." 37 C.F.R. § 42.10(c). "For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding." *Id.*

As set forth below, and in the accompanying Declaration of Zachary M. Coots in Support of Motion to Appear *Pro Hac Vice* ("Coots Decl.," Exhibit 1019), the facts here establish good cause for the Board to recognize Zachary Coots *pro hac vice* in this proceeding.

1. Mr. Coots is a member in good standing of the State Bar of the District of Columbia (Bar No. 1618448). *See* Exhibit 1019, ¶ 2.

2. Mr. Coots has never been suspended or disbarred from practice before any court or administrative body. *See* Exhibit 1019, ¶ 3.

3. None of Mr. Coots's applications for admission to practice before any court or administrative body have ever been denied. *See* Exhibit 1019, ¶ 4.

4. Mr. Coots has never been sanctioned nor had a contempt citation imposed on her by any court or administrative body. *See* Exhibit 1019, ¶ 5.

5. Mr. Coots has declared that he has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trial set forth in part 42 of 37 C.F.R. *See* Exhibit 1019, ¶ 6.

6. Mr. Coots has acknowledged and agrees that he 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). *See* Exhibit 1019, ¶ 7.

7. Mr. Coots is an attorney in the Intellectual Property practice of King & Spalding LLP. *See* Exhibit 1019, ¶ 8. Mr. Coots is an experienced patent litigation attorney with a focus in the fields of electrical engineering, computer science, mechanical engineering, and business methods. *See* Exhibit 1019, ¶ 8. Mr. Coots been practicing for over 4 years, representing both patent owners and those accused of patent infringement in federal district courts across the country,

before the International Trade Commission, and in *inter partes* review proceedings before the Patent Trial and Appeal Board. *See* Exhibit 1019, ¶ 8. Mr. Coots was admitted Pro Hac Vice in *F5, Inc. v. SunStone Information Defense, Inc.*, IPR2022-00483 (PTAB, Jan. 19, 2023) and *Eden Park Illumination, Inc. et al. v. Neister*, IPR2022-00381 (PTAB, Nov. 8, 2022). Exhibit 1019, ¶ 8. Mr. Coots is experienced with Patent Trial and Appeal Board procedure, having clerked for Administrative Patent Judges, Michael Kim, Rama Elluru, and Garth Baer from 2018-2019. *See* Exhibit 1019, ¶ 9. Mr. Coots has familiarity analyzing patents and prior art and addressing patent claim amendments, having served as a patent examiner in TC 3685. *See* Exhibit 1019, ¶ 10. Additionally, Mr. Coots has a technical background pertinent to the issues in this proceeding, including a B.S. in mechanical engineering from the University of Western Kentucky University. *See* Exhibit 1019, ¶ 11.

8. Mr. Coots has studied and analyzed the field of technology relevant to the ’784 patent, as well as the claims, specification, and prosecution history of the ’784 patent. Accordingly, Mr. Coots has become very familiar with both the particular subject matter and substantive issues concerning the ’784 patent. He is also familiar with the prior art references asserted in this *inter partes* review proceeding. *See* Exhibit 1019, ¶ 12.

In view of Mr. Coots's knowledge of the subject matter and procedures at issue in this proceeding, Patent Owner has a substantial need for Mr. Coots's *pro hac vice* admission and his involvement in this proceeding.

II. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Zachary Coots *pro hac vice* in this proceeding.

Dated: February 15, 2024

Respectfully submitted,

KING & SPALDING LLP

By: */s/ Dara M. Kurlancheek*
Dara M. Kurlancheek, Reg. No. 69,815
Zachary Coots, *pro hac vice to be submitted*

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the forgoing **PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF ZACHARY COOTS AND EXHIBIT 1019** were served via electronic mail on February 15, 2024, on the following:

Douglas L. Sawyer, Esq.
Mark T. Smith, Esq.
PAUL HASTINGS, LLP
71 South Wacker Drive, Suite 4500
Chicago, IL 60606

Respectfully submitted,

By: */s/ Dara M. Kurlancheek*
KING & SPALDING LLP
1700 Pennsylvania Avenue NW
Suite 200
Washington, D.C. 20006
(202) 626-5590

Counsel for Petitioner