UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DISH NETWORK LLC, DISH NETWORK SERVICE LLC, DISH NETWORK CORPORATION, and DISH NETWORK CALIFORNIA SERVICE CORPORATION,
Petitioners,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2024-00462
Patent 7,889,759

PATENT OWNER ENTROPIC COMMUNICATIONS LLC'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF COLETTE WOO UNDER 37 C.F.R. § 42.10(c)

EXHIBIT LIST	
2001	Declaration of Nathan Lowenstein in Support of Motion for *Pro Hac Vice* Admission
2002	Declaration of Colette Woo in Support of Motion for *Pro Hac Vice* Admission
2003	Declaration of Samuel H. Russ, Ph.D.
2004	Excerpts from Samuel H. Russ, *Signal Integrity Applied Electromagnetics and Professional Practice* [Signal-Integrity]
2005	OneRingNetworks, *What is a T1 line and How Fast is T1 Internet?*, September 28, 2018, https://oneringnetworks.com/what-is-a-t1-line-and-how-fast-is-t1-internet [One-Ring-Networks]
2006	Excerpts from Andrew Afflerbach, *Existing and Emerging Broadband Technologies* [CTC]
2007	Excerpts from Cable Television Laboratories, Inc., *Radio Frequency Interface Specification*, November 19, 2001 [Cable-Television-Laboratories]
2008	The Cable Center, *The Cable History Timeline*, 2014, https://syndeoinstitute.org/wp-content/uploads/2022/10/CableTimelineFall2015.pdf [Cable-History-Timeline]
2009	Sparklight Business, *Coaxial Cable vs. Twisted Pair*, https://business.sparklight.com/the-wire/tech-talk/business-internet/coaxial-cable-vs-twisted-pair (last visited May 24, 2024) [Coaxial-vs-Twisted-Pair]
2010	GNS Wireless, *Coaxial Cables*, https://www.gnswireless.com/product-category/products/coaxial-cables/ (last visited May 20, 2024) [Coaxial-Products]

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Alexandria, Virginia 22313-1450

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Entropic Communications LLC ("Patent Owner") respectfully requests that the Board admit Colette Woo *pro hac vice* in this proceeding as back-up counsel. Patent Owner has met and conferred with Petitioner, and Petitioner does not oppose this motion.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c), 37 C.F.R., provides that:

> The Board may recognize counsel *pro hac vice* during a 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. 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.

The Board has further required that a motion for *pro hac vice* admission be filed in accordance with the "Order - Authorizing Motion for *Pro Hac Vice* Admission" entered in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) ("*United Patents* Order").

The *United Patents* Order requires that such motions (1) "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding[,]" and (2) "[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:"

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear 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 37 C.F.R.;

vi. The individual will be subject to the U.S.P.T.O. 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);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Colette Woo, submitted herewith as Exhibit 2002, Patent Owner requests the *pro hac vice* admission of Colette Woo in this proceeding:

1. Patent Owner's lead counsel, Jason A. Engel is a registered practitioner (Reg. No. 51,654). Patent Owner's first back-up counsel, Kenneth J. Weatherwax (the undersigned) is also a registered practitioner (Reg. No. 54,528).

2. Ms. Woo is an associate at the law firm of Lowenstein & Weatherwax LLP. Ex. 2002 ¶ 8.

3. The majority of Ms. Woo's practice has consisted of patent related matters such as PTAB litigations. *Id*. ¶ 9.

4. Ms. Woo's experience in post-grant patent proceedings includes drafting patent owner responses, taking depositions, and presenting oral arguments before the Board. *Id*. ¶ 10. Representative matters where Ms. Woo is or was actively involved include:

- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).
- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).

- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).
- *Apple Inc. v. SEVEN Networks, LLC* (IPR2020-00236, -00254, -00255, -00280, -00281, -00285, -00584, -00506, -00507).

Ex. 2002 ¶ 10.

5. Ms. Woo has an established familiarity with the subject matter at issue in this proceeding. *Id*. ¶ 13. Ms. Woo has reviewed the Patent at issue as well as the Petition and the relevant art. *Id*.

6. Ms. Woo is a member in good standing of the State Bar of California. *Id*. ¶¶ 1, 2.

7. Ms. Woo has never been suspended or disbarred from practice before any court or administrative body. *Id*. ¶ 3.

8. No application of Ms. Woo for admission to practice before any court or administrative body has ever been denied. *Id*. ¶ 4.

9. No sanctions or contempt citations have ever been imposed against Ms. Woo by any court or administrative body. *Id*. ¶ 5.

10. Ms. Woo 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 37 C.F.R. Ex. 2002 ¶ 6.

11. Ms. Woo understands that she will be subject to the U.S.P.T.O. 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). Ex. 2002 ¶ 7.

12. Ms. Woo has previously been admitted *pro hac vice* in the following matters:

- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).
- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).
- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).
- *Apple Inc. v. SEVEN Networks, LLC* (IPR2020-00236, -00285).

Ex. 2002 ¶ 11.

13. Ms. Woo is concurrently applying for *pro hac vice* admission in the following matters:

- Dish Network LLC et al. v. Entropic Communications, LLC (IPR2024-00560).

Id. ¶ 12.

14. Other than the matters identified in ¶ 12-13, *supra*, Ms. Woo has not applied to appear *pro hac vice* in any other proceedings before the U.S.P.T.O. in the last three years.

IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF COLETTE WOO.

The Board may recognize counsel *pro hac vice* 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).

The facts outlined above in the Statement of Facts, and contained in the Declaration of Colette Woo (Ex. 2002), establish that there is good cause to admit Ms. Woo *pro hac vice* in this proceeding. Patent Owner's lead and first back-up counsel are registered practitioners. Ms. Woo has experience in post-grant patent proceedings. She also has an established familiarity with the subject matter at issue, including the patents, petitions, and references.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Ms. Woo *pro hac vice* in this proceeding.

Respectfully submitted,

/ Kenneth J. Weatherwax /

Kenneth J. Weatherwax, Reg. No. 54,528
LOWENSTEIN & WEATHERWAX LLP

Date: June 20, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

PATENT OWNER ENTROPIC COMMUNICATIONS LLC'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF COLETTE WOO UNDER 37 C.F.R. § 42.10(c)

EXHIBIT 2002

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

Adam R. Shartzer IPR45035-0026IP1@fr.com
Ruffin B. Cordell
Michael J. Ballanco
Matthew P. Mosteller
John J. Thuermer
Alyaman Amer
Timothy Riffe
Usman Khan

Respectfully submitted,

/ Gwynneth Orlino /

Date: June 20, 2024