

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REOLINK INNOVATION INC. AND
SHENZHEN REOLINK TECHNOLOGY CO., LTD.,
Petitioner,

v.

THROUGHTTEK CO., LTD.,

Patent Owner

IPR2024-00509
Patent RE47,842

**PETITIONER’S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF MENGLIN SUN UNDER 37 C.F.R. § 42.10(c)**

PETITIONER'S UPDATED EXHIBIT LIST

EX1001	Declaration of Harry Bims, Ph.D.
EX1002	U.S. Patent No. RE47,842 (“the ’842 patent”)
EX1003	Prosecution History of Provisional Application Serial No. 61/812,262 (“the provisional application”)
EX1004	Prosecution History of U.S. Patent No. 9,787,498 (“the utility application”)
EX1005	Prosecution History of the ’842 patent (“the reissue application”)
EX1006	Lorex LNC100 Series User’s Guide Version 2.0 (2012), <i>available at</i> https://www.lorextechnology.com/downloads/ip-cameras/LNC104/LNC100_SERIES_MANUAL_EN_R2_web.pdf (“Lorex Guide”)
EX1007	U.S. Publication No. 2011/0082941 (“Kim”)
EX1008	Lorex Technology Inc., “How-to Set Up and Connect the NEW Lorex LNC100 Series IP Network Camera” (October 19, 2012), <i>available at</i> https://www.youtube.com/watch?v=DPaIWj2f65I (“Lorex Video”)
EX1009	Lorex Technology Inc., “How-To Get to Know New Lorex IP Wireless Network Camera” (October 5, 2012), <i>available at</i> https://www.youtube.com/watch?v=g9U-xhOk8kQ (“Lorex Unboxing”)
EX1010	Lorex Technology Inc., “How to Set up Wireless Network Cameras Using QR codes” (November 23, 2012), <i>available at</i> https://www.youtube.com/watch?v=HzJfkqg2VWY (“Lorex QR Codes”)
EX1011	Declaration of Vlad Kardashov
EX1012	[RESERVED]

EX1013	[RESERVED]
EX1014	Korean Patent No. KR100984288B1
EX1015	Certified English Translation of Korean Patent No. KR100984288B1 (“Park”)
EX1016	German Utility Model No. DE202012101164U1
EX1017	Certified English Translation of German Utility Model No. DE202012101164U1 (“Throughtek-2012”)
EX1018	Throughtek Co. Ltd., <i>CSJ233 P2P IP Camera Plug and View Instant Surveillance</i> (2011) (“2011 Brochure”)
EX1019	<i>ThroughTEK Co., Ltd. v. Reolink Innovation Inc. et al.</i> , Case No. 1-23-cv-00218 (DDE), Document 1 (Complaint), February 28, 2023
EX1020	Ford et al., <i>Peer-to-Peer Communication Across Network Address Translators</i> , USENIX Annual Technical Conference, pp. 179-192 (2005)
EX1021	Reolink Technology Co., Ltd., <i>Reolink Support Initial Setup for Reolink Argus Series Cameras via Reolink App</i> (Aug. 22, 2019), available at https://www.youtube.com/watch?v=jn2BhMmKcyg (“Reolink Video”)
EX1022	U.S. Publication No. 2014/0013100 (“Menzel”)
EX1023	U.S. Publication No. 2012/0287290 (“Jain”)
EX1024	Saxena et al., <i>Secure Device Pairing based on a Visual Channel</i> , IEEE Symposium on Security and Privacy (2006) (“Saxena”)
EX1025	U.S. Publication No. 2010/0259549 (“Brown”)

- EX1026 Scott et al., *Using Visual Tags to Bypass Bluetooth Device Discovery*, *Mobile Computing & Communications Review*, Vol. 1, No. 2 (2005) (“Scott”)
- EX1027 Eppinger, *TCP Connections for P2P Apps: A Software Approach to Solving the NAT Problem*, Carnegie Mellon University Institute for Software Research International (2005) (“Eppinger”)
- EX1028 Maier et al., *NAT Hole Punching Revisited*, 36th Annual IEEE Conference on Local Computer Networks (2011) (“Maier”)
- EX1029 U.S. Publication No. 2008/0313721 (“Corella”)
- EX1030 Declaration of David M. Barkan in Support of Petitioner’s Unopposed Motion For *Pro Hac Vice* Admission
- EX1031 Declaration of Jessica Wang in Support of Petitioner’s Unopposed Motion For *Pro Hac Vice* Admission
- EX1032 Declaration of Menglin Sun in Support of Petitioner’s Unopposed Motion For *Pro Hac Vice* Admission

Pursuant to 37 C.F.R. § 42.10(c), Petitioner, Reolink Innovation Inc. and Shenzhen Reolink Technology Co., Ltd. (collectively, “Petitioners” or “Reolink”) respectfully request that the Board recognize Menglin Sun as counsel *pro hac vice* in this proceeding. Petitioner seeks the counsel of Ms. Sun due to her experience in representing Reolink in other patent-related matters and particularly due to her familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on February 13, 2024.

Patent Owner does not oppose this motion.

Statement of Facts

Ms. Sun is a patent litigation attorney with 3 years of experience representing clients in cases involving consumer products, chemical formulations, and electrical products. Ms. Sun’s biography is attached as Appendix A of Exhibit 1032.

Ms. Sun also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding. In a related matter, *ThroughTEK Co., Ltd. v. Reolink Innovation Inc. et al.*, Case No. 1-23-cv-00218 (DDE) at the United States District Court for the District of Delaware, Ms.

Sun served as counsel for Reolink and specifically handled technical and discovery issues related to the patent-at-issue in this proceeding.

Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Menglin Sun.

Accordingly, Reolink submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Menglin Sun as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Date: January 22, 2025

/Michael T. Hawkins/
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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on January 22, 2025, a complete and entire copy of this Petitioner's Motion for Pro Hac Vice and Exhibit 1032 were provided via email, to the Patent Owner by serving the email correspondence addresses of record as follows:

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