

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR, LLC,
Petitioner

v.

CHIEN-MIN SUNG,
Patent Owner

IPR2024-00535
U.S. Patent No. 9,724,802

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION
UNDER 37 C.F.R. § 42.10(c)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via PTAB E2E

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.10(c) and 42.22, Patent Owner Chien-Min Sung (“Sung”) respectfully requests that the Board recognize Peter A. Mazur of Devlin Law Firm LLC as backup counsel *pro hac vice* during this proceeding. The facts, supported by the attached Declaration of Peter A. Mazur in support of Motion for Admission *Pro Hac Vice* (“Mazur Decl.”, Exhibit 2019), establish good cause to admit Mr. Mazur *pro hac vice* in this proceeding. Patent Owner conferred with Petitioners, and Petitioners confirmed that they do not oppose this Motion.

II. STATEMENT OF FACTS

The following statement of facts shows that there is good cause for the Board to recognize Mr. Mazur *pro hac vice*. Mr. Mazur is a litigation attorney and has an established familiarity with the subject matter at issue in this proceeding.

Lead counsel for Patent Owner, Alex Chan, is a registered practitioner (Reg. No. 52,713) and experienced in *inter partes* proceedings in the USPTO.

Peter A. Mazur joined Devlin Law Firm LLC as an intellectual property litigation attorney in 2019. (Mazur Decl. ¶ 1.) Mr. Mazur has gained experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on infringement and validity issues, participating in depositions of fact and expert witnesses, briefing issues of claim construction and

summary judgment, preparing for *Markman* hearings, and assisting in patent litigation trials before district courts around the country. (*Id.* at ¶ 1.)

Mr. Mazur is a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of Delaware. (*Id.* at ¶ 2.) Mr. Mazur has never been suspended or disbarred from practice before any court or administrative body. (*Id.* at ¶ 3.) Nor has any court or administrative body imposed sanctions or contempt citations against him. (*Id.* at ¶ 3.)

Mr. Mazur 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 the C.F.R. (Mazur Decl. at ¶ 4.) Mr. Mazur will be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. § 10.20 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). (*Id.* at ¶ 5.)

Mr. Mazur was previously admitted *pro hac vice* in IPR2021-1342, *Applied Materials, Inc. v. Ocean Semiconductor LLC* (Paper 26) and IPR2021-1344, *Applied Materials, Inc. v. Ocean Semiconductor LLC* (Paper 26). (*Id.* at ¶ 4.)

Mr. Mazur is a litigation attorney and has established familiarity with the subject matter at issue in this proceeding. (Mazur Decl. at ¶¶ 7-8.) He is familiar with U.S. Patent No. 9,724,802 and all prior art references and alleged grounds of invalidity relied upon by Petitioners in this proceeding. (*Id.* at ¶ 8.) Moreover, Mr. Mazur has engaged and will continue to engage in extensive strategic and

substantive discussions regarding this proceeding with Alex Chan, who is a registered practitioner and the lead counsel for Patent Owner in this proceeding. (*Id.*)

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

III. ANALYSIS

The facts contained in the Statement of Facts above and Mr. Mazur's Declaration establish that there is good cause to admit Mr. Mazur *pro hac vice* in this proceeding under 37 C.F.R. § 42.10 as backup counsel. Lead counsel Alex Chan is a registered practitioner and experienced in *inter partes* proceedings in the USPTO.

IV. CONCLUSION

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

Dated: June 16, 2025

Respectfully submitted,

DEVLIN LAW FIRM LLC

By: /Alex Chan/

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Lead Counsel for Patent Owners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on June 16, 2025, the foregoing document is being served via electronic mail upon the following counsel of record for Petitioner:

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