

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC. and AMAZON.COM SERVICES LLC,

Petitioners

v.

NOKIA TECHNOLOGIES OY,

Patent Owner.

IPR2024-00572

U.S. Patent No. 7,724,818

**PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION OF
ANDREW KLEIN PURSUANT TO 37 C.F.R. § 42.10(C)**

EXHIBIT LIST

Exhibit	Reference
1001	U.S. Patent No. 7,724,818 (“the ’818 patent” or “’818Pat.”)
1002	Certified File History of the ’818 patent (“’818FH”)
1003	Declaration of Dr. Eli Saber (“Saber”)
1004	Curriculum Vitae of Dr. Eli Saber
1005	U.S. Patent No. 7,660,356 to Linzer (“Linzer”)
1006	Certified File History of Linzer (“LinzerFH”)
1007	Editor's Proposed Draft Text Modifications for Joint Video Specification (IUT-T Rec. H.264 ISO/IEC 14496-10 AVC), Draft 7 (“JVT-E022d7”) (excerpted from LinzerFH)
1008	U.S. Patent No. 6,646,578 (“Au”)
1009	Nokia Technologies Oy v. Amazon.com, Inc. et al., Case No. 1:23-cv-01236, ECF No. 6, (D. Del. Nov. 3, 2023) (Summons served 10/31/2023)
1010	Nokia Corporation et al. v. Amazon.com, Inc. et al., Case No. 1:23-cv-01232, ECF No. 8, (D. Del. Nov. 3, 2023) (Summons served 10/30/2023)
1011	February 2, 2024 Email from Joshua Newcomer with subject line “1380: Nokia’s proposed constructions.”
1012	H.26L over IP and H.324 Framework (“VCEG-N52”), available at https://www.itu.int/wftp3/av-arch/video-site/0109_San/VCEG-N52.doc (excerpted from ’818FH)
1013	Analysis of fractional pixel interpolation for MC prediction (“VCEG-N55”), available at https://www.itu.int/wftp3/av-arch/video-site/0109_San/VCEG-N55.doc .
1014	Declaration of June Munford (“Munford”)
1015	Tekalp, A. (1995). Digital Video Processing
1016	Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, and Components and Modules Thereof, Inv. No. 337-TA-1380 (USITC Nov. 30. 2023), Exhibit 6A to Complaint

1017	Certain Video Capable Electronic Devices, Including Computers, Streaming Devices, Televisions, and Components and Modules Thereof, Inv. No. 337-TA-1380 (USITC Nov. 30. 2023), Exhibit 6B to Complaint
1018	U.S. Patent Publication No. 2004/0161033 (“Notoya”)
1019	William Stallings, Computer Organization and Architecture, Designing for Performance, 8th Edition (2010)
1020	U.S. Patent No. 7,227,901 (“Joch”)
1021	U.S. Patent No. 6,539,059 (“Sriram”)
1022	Video coding for low bit rate communication (ITU-T H.263 Series H: Audiovisual and Multimedia Systems, Infrastructure of audiovisual services – Coding of moving video)
1023	John Watkinson, The MPEG Handbook, Second Edition (2004)
1024	Brian W. Kernighan and Dennis M. Ritchie, The C Programming Language, Second Edition (1988)
1025	Declaration of Dr. Clifford Reader (“Reader”)
1026	Email from G. Sullivan to Krishna Ratakonda and the <jvt-experts@mail.imtc.org> (May 25, 2002) (“Sullivan email”)
1027	Coding of Parameter Sets Annex A – Slice Layer Changes Relative to JVTW WD2r7 – with tracked changes, (“JVT-C078 Annex A with tracked changes”), available at https://www.itu.int/wftp3/av-arch/jvt-site/2002_05_Fairfax/
1028	Removal of the Picture Layer (“JVT-D066”), available at https://www.itu.int/wftp3/av-arch/jvt-site/2002_07_Klagenfurt/
1029	Network Abstraction Layer and High-level Syntax, (“JVT-D087”), available at https://www.itu.int/wftp3/av-arch/jvt-site/2002_07_Klagenfurt/
1030	Affidavit of Andrew Klein

Petitioner Amazon.com, Inc. and Amazon.com Services, LLC (“Petitioners”) respectfully request that the Board admit Andrew Klein as backup counsel *pro hac vice* in this proceeding. Mr. Klein is a patent litigation attorney with substantial knowledge of the substantive issues concerning invalidity of the challenged claims of the Patent in this proceeding. He is counsel for Petitioners in the related proceeding before the International Trade Commission. Therefore, Mr. Klein meets the requirements of “an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding” under 37 C.F.R. §42.10(c).

I. TIME FOR FILING

This Motion for *Pro Hac Vice* Admission is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on April 29, 2024 (Paper No. 4). This Motion is filed no sooner than twenty-one (21) days after service of the Petition.

II. STATEMENT OF FACTS

In this proceeding, lead counsel for Petitioners is Jessica Kaiser, a registered practitioner. The following statement of facts demonstrate good cause for the Board to recognize Mr. Klein *pro hac vice*.

Mr. Klein is a patent litigation attorney with more than 10 years of experience representing clients in cases involving patents or other intellectual property interests.

(Affidavit of Andrew Klein (“Klein Affidavit”), ¶ 7 in Exhibit 1030.) He is a member in good standing of the State Bar of California. Mr. Klein has also been admitted *pro hac vice* before the Board in:

Adobe Inc. v. RAH Color Technologies LLC: IPR2019-00627, IPR2019-00628, IPR2019-00629, IPR2019-00646;

H-E-B, LP v. Digital Retail Apps, Inc.: IPR2020-00148, IPR2020-00149, IPR2020-00347, IPR2020-00348;

Netskope, Inc. v. Bitglass, Inc.: IPR2021-01045, IPR2021-01046, PGR2021-00091, PGR2021-00092; and

Netskope, Inc. v. Fortinet, Inc.: IPR2023-00030, IPR2023-00175, IPR2023-00456, IPR2023-00457, IPR2023-00458, IPR2023-00459, IPR2022-01587.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This motion for *pro hac vice* admission is accompanied by the Affidavit of Mr. Klein (Exhibit 1030), as required.

IV. CONCLUSION

Accordingly, Petitioners submit that there is good cause under 37 C.F.R. 42.10(c) for the Board to admit Andrew Klein as counsel *pro hac vice* and to authorize Mr. Klein to represent Petitioners as backup counsel in this proceeding.

Respectfully submitted,

Dated: March 17, 2024

By: / Jessica Kaiser /
Jessica C. Kaiser
Reg. No. 58,937
Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on March 17, 2025, a copy of **PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW KLEIN PURSUANT TO 37 C.F.R. § 42.10(C) and EXHIBIT 1030** was served upon the below-listed counsel by electronic mail:

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Dated: March 17, 2025

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