

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner,

v.

NOKIA TECHNOLOGIES OY,

Patent Owner.

IPR2024-00604

U.S. Patent No. 10,536,714

**PETITIONER’S UNOPPOSED MOTION FOR ADMISSION *PRO HAC*
VICE OF FRED J.W. CHUNG**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Petitioner Amazon.com, Inc., Amazon.com Services LLC, (“Amazon”) requests that the Board admit Fred J.W. Chung *pro hac vice* in this proceeding. Patent Owner does not oppose.

As explained below, Mr. Chung is an associate at the law firm representing Petitioner, and Petitioner seeks to provide Mr. Chung with additional IPR experience in this matter.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

In accordance with 37 C.F.R. § 42.10(c), 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. “[W]here lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigation attorney and has an established familiarity with the subject matter at issue in the proceeding.” § 42.10(c). The facts, supported by the attached Declaration of Fred J.W. Chung in Support of Motion for Admission *Pro Hac Vice* (Ex-1052), here establish good cause for the Board to recognize Fred J.W. Chung *pro hac vice* during this proceeding.

1. Lead counsel, Harper Batts, is a registered practitioner.

2. Counsel, Fred J.W. Chung, is an Associate in the Intellectual Property Practice Group at Sheppard, Mullin, Richter, & Hampton LLP, and has been in the private practice of patent litigation for 4 years. Ex-1052, ¶8. Before practicing law, he worked as an engineer for 4 years on devices with multimedia decoding/encoding and streaming capabilities. *Id.* He has an established familiarity with the technical issues and legal issues involved in these proceedings based on his years of engineering experience and his experience litigating patents of related subject matter in the field of video encoding and decoding.

3. Mr. Chung is a member in good standing of the State Bar of California and the Oregon State Bar, and is admitted to the United States District Court for the Northern District of California and United States District Court for the District of Oregon. *Id.*, ¶1.

4. Mr. Chung is concurrently applying to appear *pro hac vice* before the Office in IPR2024-00604 and IPR2024-00605. *Id.*, ¶7. He has not applied to appear *pro hac vice* in any other proceedings before the Office in the last three (3) years. *Id.*

5. Mr. Chung is familiar with the subject matter and Petition at issue in this proceeding, including the patent, its prosecution history, and the identified references. *Id.*, ¶9. He assists lead counsel, on this and other proceedings involving

patents similarly directed to video coding subject matter, in representing Petitioner Amazon.com, Inc., Amazon.com Services LLC. *Id.*

III. CONCLUSION

For the foregoing reasons, Amazon respectfully requests that the Board admit Fred J.W. Chung *pro hac vice* in this proceeding.

Date: January 10, 2025

Respectfully submitted,

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Harper Batts/

Harper Batts (Reg. No. 56,160)
Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 10, 2025, a true and correct copy of the Petitioner's Unopposed Motion For Admission Pro Hac Vice of Fred J.W. Chung was served in entirety via email to all parties to this proceeding at the addresses indicated:

Counsel for Patent Owner

Nokia Technologies OY

Scott W. Hejny

shejny@McKoolSmith.com

Eric S. Hansen

ehansen@mckoolsmith.com

Emily Tannenbaum

etannenbaum@mckoolsmith.com

MCKOOL SMITH, P.C.

300 Crescent Court, Suite 1200

Dallas, Texas 75201

Telephone: 214.978.4000

Facsimile: 214.978.4044

MCKOOL SMITH, P.C.

1301 Avenue of the Americas

32nd Floor

New York, NY 10019

Telephone: 212.402.9441

Facsimile: 212.402.9444

MCKOOL SMITH, P.C.

303 Colorado Street, Suite 2100

Austin, TX 78701

Telephone: 512.692.8700

Facsimile: 512.692.8744

R. Mitch Verboncoeur

mverboncoeur@mckoolsmith.com

Nokia_IPRs_Amazon_HP@mckoolsmith.com

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Harper Batts/

Harper Batts (Reg. No. 56,160)

Attorney for Petitioner

Date: January 10, 2025

1540 El Camino Real Suite 120

Menlo Park, CA 94025

Tel: (650) 815-2673