UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

OURARING, INC.,
Patent Owner.

Case No. IPR2024-00928
U.S. Patent No. 9,582,034

PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION PURSUANT TO 37 C.F.R. §42.10(C)

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(C), Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Petitioner") respectfully requests that the Board recognize Khanh Leon as counsel pro hac vice in this proceeding. Petitioner's lead counsel in this proceeding is a registered practitioner and, as illustrated below, Ms. Leon is an experienced litigator with an established familiarity with this proceeding's subject matter. Thus, there is good cause for the Board to recognize Ms. Leon pro hac vice in this proceeding.

II. TIME FOR FILING

This Motion for Pro Hac Vice Admission is being filed no sooner than twenty one (21) days after service of the petition. *Unified Patents, Inc. v. Parallel Iron, LLC*, Case IPR2013-00639, Paper No. 7 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF FACTS

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 June 13, 2024 (Paper No. 4). Petitioner's lead and back-up counsel are registered practitioners.

Where lead counsel is a registered practitioner, the Board may permit a nonregistered practitioner to appear pro hac vice "upon a showing that counsel is an experienced litigating attorney and has established familiarity with the subject

matter at issue in the proceeding." 37 C.F.R. §42.10(c); *Unified Patents*, Case IPR2013-00639, Paper 7 (setting forth requirements for pro hac vice admission). As set forth in her Declaration submitted herewith (Ex. 1083), Ms. Leon is an experienced litigator. She is an Associate with O'Melveny & Myers LLP with five years of experience representing clients in patent and technology related litigation, including matters involving technology similar to that at issue in this proceeding.

Ms. Leon is familiar with the subject matter of this proceeding. She has reviewed and analyzed the patent at issue in this *inter partes* review, U.S. Patent No. 9,582,034 ("the '034 Patent") as well as the prior art at issue in this proceeding.

Based on her work for Petitioner in litigations and proceedings involving similar technologies, involvement with the petition in this proceeding, and the other facts detailed in her declaration, Ms. Leon has significant familiarity with the subject matter in this proceeding. Petitioner wishes to apply Ms. Leon's knowledge of the patent and litigation experience by employing her as counsel in this proceeding. Because Ms. Leon is an experienced practitioner with an established familiarity with the subject matter of this proceeding, Petitioner respectfully submits that there is good cause under 37 C.F.R. § 42.10(c) to recognize Ms. Leon as counsel pro hac vice during this proceeding.

IV. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This motion for Pro Hac Vice Admission is supported by the accompanying Declaration of Khanh Leon (Ex. 1083), as required by *Unified Patents*, Case IPR2013-00639, Paper 7.

Respectfully Submitted,

/s/ William M. Fink
William M. Fink (Reg. No. 72,332)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2025, I caused a true and correct copy of the foregoing PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION PURSUANT TO 37 C.F.R. §42.10(C) to be served electronically on counsel for Patent Owner at the following addresses:

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Respectfully submitted,

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