

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXAS INSTRUMENTS INC.
and NXP USA, INC.,
Petitioners,

v.

PARKERVISION, INC.,
Patent Owner.

IPR2024-00935¹
Patent 7,865,177 B2

**PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF
TAYLOR LEPORE**

¹ NXP USA, Inc., who filed a petition in IPR2024-01066, is joined as petitioner in this proceeding.

PATENT OWNER’S EXHIBIT LIST

Exhibit No.	Description
2001	Complaint, ParkerVision, Inc. v. Texas Instruments Inc., Case No. 6:23-cv-00384-ADA (WDTX)
2002	Agreed Scheduling Order, ParkerVision, Inc. v. Texas Instruments Inc., Case No. 6:23-cv-00384-ADA (WDTX)
2003	Dani Kass, “Catching Up On Patent Litigation With Judge Albright,” LAW360 (Mar. 14, 2023)
2004	Sonrai Memory Ltd. v. Kingston Tech. Co., Inc., Case No. 6:21-cv-1284-ADA, Order Denying Kingston Tech. Co. and Kingston Tech. Corp.’s Opposed Motion to Stay Pending Resolution of Inter Partes Review, Dkt. 94 (W.D. Tex., Oct. 18, 2022)
2005	Docket Order, Kerr Machine Co. d/b/a Kerr Pumps v. Vulcan Industrial Holdings, LLC, No. 6:20-cv-00200 (W.D. Tex. Aug. 2, 2020)
2006	Court Order adopting Special Master’s Report and Recommendation, dated January 21, 2025 (Dkt. 65) – CA No. 6:23-cv-00389 (WDTX)
2007	Court Claim Construction Order dated April 29, 2020 –No. 6:14-cv-687 (MDFL)
2008	RESERVED
2009	UA741 datasheet
2010	Boeing Report dated April 29, 1998
2011	ParkerVision schematic dated January 20, 1998
2012	Eddie chip layout dated March 6, 1997
2013	ParkerVision circuit board layout
2014	ParkerVision schematic dated August 21, 1997
2015	Conception/Reduction to practice chart
2016	Declaration of David Sorrells
2017	Proakis, J. et al., Communication Systems Engineering
2018	09/550,644 prosecution history excerpt
2019	ParkerVision Announces Breakthrough in Wireless Radio Frequency Technology
2020	Laboratory Tests Verify ParkerVision Wireless Technology
2021	Universal Direct Conversion Receiver Evaluation ASIC Contract between ParkerVision and The Boeing Company

2022	Notes from Boeing Tests
2023	Sklar B., Digital Communications Fundamentals and Applications
2024	Declaration of Dr. David Ricketts
2025	Excerpts from Howe, R. et al., Microelectronics: An Integrated Approach
2026	RESERVED
2027	Development Agreement between ParkerVision and TriQuint Semiconductor dated March 4, 1997
2028	Default Protective Order
2029	Spreadsheet showing ParkerVision files
2030	Claim Construction Order dated 2/20/13 – No. 3:11-cv-00719 (MDFL)
2031	Excerpt of Graf, R., Modern Dictionary of Electronics, Seventh Edition
2032	Rofougaran, A., et al., A 1 GHz CMOS RF Front-End IC for a Direct Conversion Wireless Receiver
2033	U.S. Patent No. 6,061,551
2034	Deposition Transcript of Ian Galton, dated March 12, 2025
2035	Special Master’s Report and Recommendation Regarding Claim Construction, dated October 21, 2024 (Dkt. 45) – CA No. 6:23-cv-00389 (WDTX)
2036	Full table of contents for Proakis, J. et al., Communication Systems Engineering
2037	Full table of contents for Sklar B., Digital Communications Fundamentals and Applications
2038	Full table of contents for Howe, R. et al., Microelectronics: An Integrated Approach
2039	Declaration of Taylor Lepore

I. INTRODUCTION AND PRECISE RELIEF REQUESTED

ParkerVision, Inc. (“Patent Owner”) requests that the Board recognize Taylor Lepore as counsel *pro hac vice* during this proceeding. This motion was authorized in the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response. (Paper 3 at 2.) Because this motion meets all of the Board’s requirements, Petitioner requests that the Board grant this motion. Prior to filing this motion, Patent Owner conferred with Petitioner, and Petitioner indicated that it does not intend to oppose this motion.

II. STATEMENT OF FACTS

Patent Owner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. §42.10(c). (See Paper 3 at 2.) Patent Owner’s lead counsel and back-up counsel are registered practitioners. (Paper 4 at 2-3.) As set forth in the accompanying declaration, Ms. Lepore is an attorney at Daignault Iyer LLP. (Exhibit 2039 at ¶ 2.) She is an experienced litigating attorney with more than three years of experience and has served as counsel in several patent infringement lawsuits before the district courts, and has supported various aspects of *Inter Partes* Review proceedings. (*Id.*)

Ms. Lepore has an established familiarity with the subject matter at issue in this proceeding. (*Id.* at ¶ 9.) Ms. Lepore has reviewed U.S. Patent No. 7,865,177

(“the ’177 patent”), the patent-at-issue, and other papers associated with this matter. (*Id.*)

In addition, Ms. Lepore is a member in good standing of the New Jersey Bar. (*Id.* at ¶ 1.) She has never been suspended or disbarred from practice before any court or administrative body. (*Id.* at ¶ 3.) She has never had an application for admission to practice before any court or administrative body denied. (*Id.* at ¶ 4.) She has never had sanctions or contempt citations imposed by any court or administrative body. (*Id.* at ¶ 5.) She 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 title 37 of the Code of Federal Regulations. (*Id.* at ¶ 6.) She agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101, *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). (*Id.* at ¶ 7.) Ms. Lepore has not applied to appear *pro hac vice* in any other proceedings before the Office in the last three years. (*Id.* at ¶ 8.)

III. REASONS FOR GRANTING THE MOTION

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.” 37 C.F.R. § 42.10(c). For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon showing that counsel who is seeking

pro hac vice admission is “an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” (*Id.*) The motion for *pro hac vice* admission must contain a statement of facts showing good cause and be accompanied by a declaration of the individual who is seeking admission. *See Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper No. 7 at 3-4 (P.T.A.B. Oct. 15, 2013). The declaration in turn must contain certain attestations. (*Id.*)

This motion and the accompanying declaration meet all of the Board’s requirements. The lead counsel in this proceeding, Jason Charkow, is a registered practitioner. (Paper 4 at 2.) Ms. Lepore is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding. (*See* Exhibit 2039 at ¶¶ 2, 9.) Ms. Lepore’s declaration makes the necessary attestations. (*Id.* at ¶ 10.)

IV. CONCLUSION

For the foregoing reasons, Patent Owner submits that there is good cause for the Board to recognize Ms. Lepore as counsel *pro hac vice* in this proceeding.

IPR2024-00935
Patent No. 7,865,177

Dated: May 22, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF TAYLOR LEPORE, together with Exhibit 2039, filed therewith, was served electronically via email on May 22, 2025, on the following counsel of record for Petitioners:

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