

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THERMALTAKE TECHNOLOGY CO., LTD. and
THERMALTAKE INC. (a.k.a. THERMALTAKE USA)
Petitioners,

v.

LIAN LI INDUSTRIAL CO., LTD., and CHEN, CHIEN-HAO,
Patent Owners.

IPR2024-01230
U.S. Patent No. 10,690,336

**PATENT OWNERS' UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF KYLE D. CHEN UNDER 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10, and pursuant to the authorization provided by the United States Patent and Trademark Office's Patent Trial and Appeal Board ("Board") in Paper Number 5, dated August 22, 2024 ("the Notice"), Patent Owners Lian Li Industrial Co., Ltd. and Chen, Chien-Hao ("Patent Owners") submit this unopposed motion for Kyle D. Chen to appear *pro hac vice*. Patent Owners respectfully request the Board to recognize Mr. Chen as counsel *pro hac vice* during this proceeding and demonstrate good cause for doing so as shown below.

I. TIME FOR FILING

Pursuant to the authorization provided in the Notice, this motion for *pro hac vice* admission is being filed no sooner than twenty-one days after service of the Petition.

II. STATEMENT OF FACTS

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Chen *pro hac vice*.

Patent Owners' lead counsel for this proceeding, Heath Briggs, is a registered practitioner (Reg. No. 54,919).

Mr. Chen is an experienced litigation attorney with almost 20 years of patent litigation experience. Ex. 2004 at ¶ 9. He has been involved in numerous patent infringement cases in federal district courts across the country. *Id.* He has experience in various aspects of patent infringement matters, including all aspects of litigation

leading up to and including trials. *Id.* He is counsel for Patent Owners in *Lian Li Industrial Co., Ltd. and Chen, Chien-Hao v. Thermaltake Technology Co., Ltd. and Thermaltake Inc. (a.k.a. Thermaltake USA)*, Case No. 2:23-cv-07470-MAR (C.D. Cal.), filed on September 8, 2023, and *Lian Li Industrial Co., Ltd. and Chen, Chien-Hao v. Phanteks Europe and Axpertec Inc. (a.k.a. Phanteks USA)*, Case No. 2:23-cv-07471 (C.D. Cal.), filed on September 8, 2023, wherein the patent at issue in this IPR proceeding, U.S. Patent No. 10,690,336 (hereinafter the “’336 patent”), is currently being asserted. Ex. 2004 at ¶ 8.

Mr. Chen is a member in good standing in the bar of California, several U.S. District Courts, the U.S. Court of Appeals for the Federal Circuit, and the Supreme Court of the United States. *Id.* at ¶ 1.

Mr. Chen has not been suspended or disbarred by, and has never had any application for admission to, any court or administrative body denied, and has never had any sanctions or contempt citation imposed against him. *Id.* ¶¶ 2-4.

Mr. Chen has obtained substantial familiarity with the involved patent, the prior art, and the various issues raised in this proceeding. *Id.* at ¶¶ 8-9. Moreover, Mr. Chen has reviewed the ’336 patent, the Petition, the prior art, and all other cited materials. *Id.* He was involved in the preparation of the Preliminary Response. *Id.* Given his extensive patent litigation experience and as the main attorney who has analyzed and litigated the ’336 patent, Mr. Chen has established familiarity with the

subject matter at issue in this proceeding. *Id.*

Mr. Chen applied for *pro hac vice* in *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00144, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00146, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00334, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00337, *Cooler Master Co., Ltd. v. Aavid Thermalloy LLC*, No. IPR2019-00338, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00522, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00523, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2020-00524, *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2021-01195, and *CoolIT Systems, Inc. v. Asetek Danmark A/S*, No. IPR2021-01196. *Id.* at ¶ 7. Mr. Chen has not applied to appear *pro hac vice* in any other proceedings before the Office in the last three (3) years. *Id.* at ¶ 7.

Given Mr. Chen's familiarity with the subject matter at issue in this proceeding, Patent Owners respectfully submit that it has shown good cause for the Board to recognize Mr. Chen as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion is accompanied by the Declaration of Mr. Chen.

Respectfully submitted,

GREENBERG TRAURIG, LLP

Date: April 8, 2025

By: /s/ Heath J. Briggs

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of this **PATENT OWNERS' UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF KYLE D. CHEN UNDER 37 C.F.R. § 42.10 AND EXHIBIT 2004** have been electronically served on Petitioner by emailing the following addresses:

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GREENBERG TRAURIG, LLP

Date: April 8, 2025

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