UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS, AMERICA, INC.,
Petitioners,

v.

CERENCE OPERATING COMPANY,
Patent Owner.

Case IPR2024-01267
U.S. Patent No. 9,026,428

CERENCE OPERATING COMPANY'S MOTION FOR *PRO HAC VICE* ADMISSION OF JAMES S. TSUEI

Patent Owner, Cerence Operating Company, hereby requests that the Board recognize James S. Tsuei as counsel *pro hac vice* for this proceeding under 37 C.F.R. § 42.10(c).

I. Declaration Of Individual Seeking To Appear

This Motion for Pro Hac Vice admission is accompanied by declaration of Mr. James S. Tsuei ("Tsuei Decl.") attesting to the facts required by the Board in *Unified Patents, Inc. v. Parallel Iron, LLC*, No. IPR2013-00639 (P.T.A.B. Oct. 15, 2013) (Paper 7).

II. Statement of Facts

As required by § 42.10(c), the following statement of facts demonstrates that there is good cause for the Board to recognize Mr. James S. Tsuei *pro hac vice*.

Mr. Tsuei is an experienced patent litigation attorney. Mr. Tsuei (CA SBN 285530) has practiced patent litigation since 2012. Tsuei Decl. ¶ 2. He has experience litigating numerous patent litigation matters before U.S. district courts. U.S. Patent 9,026,428 and other patents are currently asserted by Patent Owner in pending district court litigation against Petitioner. *Id.* ¶¶ 8-10. Mr. Tsuei is among the attorneys responsible for the representation of Patent Owner in those co-pending litigations. *Id.* ¶ 10. Through his role as attorney in the co-pending litigations, he has an established familiarity with the subject matter at issue in this IPR proceeding. *Id.* Patent Owner has expended significant resources in the co-pending litigation with

Mr. Tsuei as counsel, and it wishes to continue using him as counsel in this IPR proceeding.

Patent Owner has executed a Power of Attorney authorizing Mr. Tsuei to serve as backup counsel in this IPR proceeding.

Petitioners indicated that they do not oppose this motion.

Respectfully submitted,

Dated: April 8, 2025

/ Qi (Peter) Tong /

Qi (Peter) Tong (Reg. No. 74,292)
RUSS AUGUST & KABAT
8080 N. Central Expy., Suite 1503
Dallas, TX 75206
(310) 826-7474
Attorney for Patent Owner

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on April 8, 2025, by filing this document through the P-TACTS system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioners:

Ali R. Sharifahmadian
ali.sharifahmadian@arnoldporter.com
Patrick Reidy
patrick.reidy@arnoldporter.com
Douglas Clark
douglas.clark@arnoldporter.com
Albert Boardman
albert.boardman@arnoldporter.com
xSamsungCerenceAP@arnoldporter.com

Date: April 8, 2025 / Qi (Peter) Tong /

Qi (Peter) Tong (Reg. No. 74,292)
RUSS AUGUST & KABAT
8080 N. Central Expy., Suite 1503
Dallas, TX 75206
(310) 826-7474
Attorney for Patent Owner