UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK INC.,
Petitioner,

v.

PARKERVISION, INC.,
Patent Owner.

IPR2025-00030
Patent 8,498,593

PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF ANDERSON TO

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Dr. David Ricketts
2002	Declaration of Anderson To

I. INTRODUCTION AND PRECISE RELIEF REQUESTED

ParkerVision, Inc. ("Patent Owner") requests that the Board recognize Anderson To 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 5 at 2-3.) Because this motion meets all of the Board's requirements, Patent Owner 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 5 at 2-3.) Patent Owner's lead counsel and back-up counsel are registered practitioners. (Paper 3 at 2.) As set forth in the accompanying declaration, Mr. To is an attorney at Daignault Iyer LLP. (Exhibit 2002 at ¶ 2.) He is an experienced litigating attorney with more than 7 years of experience and has supported various aspects of *Inter Partes* Review proceedings. (*Id.*)

Mr. To has an established familiarity with the subject matter at issue in this proceeding. (*Id.* at ¶ 9.) Mr. To has reviewed U.S. Patent No. 8,498,593 ("the '593 patent"), the patent-at-issue, and other papers associated with this matter. (*Id*.)

In addition, Mr. To is a member in good standing of the District of Columbia Bar. (*Id.* at ¶ 1.) He has never been suspended or disbarred from practice before any court or administrative body. (*Id.* at ¶ 3.) He has never had an application for admission to practice before any court or administrative body denied. (*Id.* at ¶ 4.) He has never had sanctions or contempt citations imposed by any court or administrative body. (*Id.* at ¶ 5.) He 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.) He 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.)

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 3 at 2.) Mr. To is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding. (*See* Exhibit 2002 at ¶¶ 2, 8.) Mr. To's declaration makes the necessary attestations. (*Id.* at ¶ 9.)

IV. CONCLUSION

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

Dated: November 3, 2025

Respectfully submitted,

By: */Jason S. Charkow/*
Jason S. Charkow (USPTO Reg. No. 46,418)*
Richard Juang (USPTO Reg. No. 71,478)*
Chandran B. Iyer (USPTO Reg. No. 48,434)
Ronald M Daignault*
jason.s.charkow@gmail.com
richard.juang@gmail.com
cbiyer@daignaultiyer.com
rdaignault@daignaultiyer.com

DAIGNAULT IYER LLP
8229 Boone Boulevard – Suite 450
Vienna, VA 22182

*Not admitted in Virginia

Attorneys for ParkerVision, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF ANDERSON TO was served electronically via email on November 3, 2025, on the following counsel of record for Petitioner:

Jessica C. Kaiser
Evan Day
Kyle R. Canavera
Perkins Coie LLP
PerkinsServiceMediatek-ParkerVisionIPRs@perkinscoie.com

Dated: November 3, 2025

Respectfully Submitted,

By: */Jason S. Charkow/*
Jason S. Charkow
USPTO Reg. No. 46,418