

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

FOUR BATONS WIRELESS, LLC,

Patent Owner

Case IPR2025-00496
Patent 8,798,006

**DECLARATION OF WILLIAM B. COLLIER, JR. IN
SUPPORT OF PATENT OWNER'S NOTICE OF INTENT TO
DESIGNATE PROVISIONALLY RECOGNIZED ATTORNEY
WILLIAM B. COLLIER, JR. AS BACK-UP COUNSEL
UNDER 37 C.F.R. § 42.10(c)**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I, William B. Collier, Jr., declare under penalty of perjury the following:

1. I am a partner at Heim Payne & Chorus, LLP, 609 Main Street Suite 3200, Houston, TX 77002, which has been retained by Patent Owner Four Batons Wireless, LLC (“Four Batons”) in this *inter partes* review.
2. The most recent prior proceeding I sought to appear and was recognized *pro hac vice* by order of the PTAB pursuant to a motion was *Charter Communications Inc. v. Iarnach Technologies, Ltd.*, IPR2024-01287 (PTAB April 4, 2025). *See* Paper 16, ORDER Granting Patent Owner’s Motion for *Pro Hac Vice* Admission of Eric J. Enger and William B. Collier, Jr. 37 C.F.R. § 42.10. I have since appeared in *Juniper Networks Inc. v. Monarch Networking Solutions LLC*, IPR2024-00485, *see* Paper 25, and *Juniper Networks Inc. v. Monarch Networking Solutions LLC*, IPR2024-00561, *see* Paper 22, by filing a Notice of Intent to Designate Provisionally Recognized PTAB Attorney.
3. I am a member in good standing of the State Bar of Texas. I am also duly admitted to practice law before the United States District Court for the Southern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Northern District of Texas, and the United States District Court for the Eastern District of Texas.
4. I have never been suspended or disbarred from practice before any court or administrative body, nor have I ever had an application for admission to practice

before any court or administrative body denied. No sanctions or contempt citations have ever been imposed against me by any court or administrative body.

5. I have 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 37 C.F.R.

6. I understand that I will be subject to the United States Patent and Trademark Office ("USPTO") Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. The proceedings before the Office for which I have applied to appear *pro hac vice* where the Board granted the motion in the last three (3) years are:

- *Charter Communications Inc. v. Iarnach Technologies, Ltd.*, IPR2024-01287, PHV Motion filed August 30, 2024 (Paper 7), granted April 4, 2025 (Paper 16).
- *Juniper Networks, Inc. v. Monarch Networking Solutions LLC*, IPR2024-00175, PHV Motion filed March 7, 2024 (Paper 8), granted March 18, 2024 (Paper 9).
- *Sercomm Corp. v. Atlas Global Technologies, LLC*, IPR2022-01520, PHV Motion filed December 16, 2022 (Paper 12), granted January 6, 2023 (Paper 17).

- *Unified Patents LLC v. Monarch Networking Solutions, LLC*, IPR2020-01708, PHV Motion filed January 27, 2022 (Paper 49), granted February 3, 2022 (Paper 49).

8. The proceedings before the Office for which Mr. Collier has applied to appear *pro hac vice* by notice in the last three years is:

- *Juniper Networks Inc. v. Monarch Networking Solutions LLC*, IPR2024-00485, Notice of Intent to Designate Provisionally Recognized PTAB Attorney filed April 25, 2025 (Paper 25).
- *Juniper Networks Inc. v. Monarch Networking Solutions LLC*, IPR2024-00561, Notice of Intent to Designate Provisionally Recognized PTAB Attorney filed May 2, 2025 (Paper 22).

9. The proceeding before the Office for which I have applied to appear *pro hac vice* where the Board never issued a decision on the motion in the last three years is:

- *Juniper Networks, Inc. v. Monarch Networking Solutions LLC*, IPR2024-00565, PHV Motion filed March 7, 2024 (Paper 8). This matter closed before any action on the application by the Board.

10. I am familiar with the subject matter at issue in this proceeding, including the patent, its prosecution history, the identified references, and the merits papers filed by the Parties.

11. I am a litigation attorney who has served as counsel in several patent infringement cases in multiple district courts over the past nine years. I also have established a familiarity with the patent at issue in this IPR by carefully studying the patent-in-suit, including its prosecution history and related prior art. Additionally, I have a B.S. degree in aerospace engineering, which included course work in computer science, and several years of litigation experience with technology related to the subject matter of the '006 Patent.

12. I will serve as backup counsel for Michael F. Heim of the law firm of Heim Payne & Chorush, LLP. Mr. Heim is lead counsel on this case and is registered to practice before the USPTO.

13. I hereby agree to notify the Board immediately of any matter affecting my standing at the bar of any other court.

14. I understand that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 20, 2025

/William B. Collier, Jr. /
William B. Collier, Jr.
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