

IPR2025-00565
Patent No. 11,069,337

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC.,
AMAZON.COM SERVICES LLC, and
AMAZON WEB SERVICES, INC.,
Petitioners

v.

SOUNDCLEAR TECHNOLOGIES LLC,
Patent Owner

IPR2025-00565
U.S. Patent No. 11,069,337

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

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Docket Printout of CA No. 1:24-01283 (EDVA)
2002	Order from Judge Anthony Trenga, dated January 10, 2025 (Dkt. 84)
2003	Scheduling order, dated September 23, 2024 (Dkt. 34)
2004	Final Scheduling Order, dated October 18, 2024(Dkt. 55)
2005	Judge Anthony Trenga's median time to trial available at https://law.lexmachina.com/shared/eyJzaGFyZWRFcGFnZV9pZCI6MTI3OTMxfQ.aA_aRw.A2n-SunBPfmUP2aka341_-3f27g
2006	Excerpts from the Motion to Stay hearing transcript, dated March 26, 2025
2007	Joint proposed scheduling order (Dkt. 48)
2008	Reply in Support of Motion to Stay, dated March 20, 2025 (Dkt. 129)
2009	Full prosecution history of U.S. Patent No. 11,069,337
2010	TransPerfect Blog – The Evolution of AI in Language Processing and Its Impact on IP/Patents
2011	Median Time to Disposition in Cases Terminated After Hearing or Submission, UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT, available at https://www.cafc.uscourts.gov/wp-content/uploads/reports-stats/FY2024/MedianDispositionTime-Merits.pdf .
2012	Declaration of Anderson To

I. INTRODUCTION AND PRECISE RELIEF REQUESTED

SoundClear Technologies LLC (“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 3-4.) 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 3-4.) Patent Owner’s lead counsel and back-up counsel are registered practitioners. (Paper 3 at 2-3.) As set forth in the accompanying declaration, Mr. To is an attorney at Daignault Iyer LLP. (Exhibit 2012 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. 11,069,337 (“the ’337 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.) Mr. To 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, Steven Reynolds, 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 2012 at ¶¶ 2, 9.) Mr. To'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 Mr. To as counsel *pro hac vice* in this proceeding.

IPR2025-00565
Patent No. 11,069,337

Dated: October 28, 2025

Respectfully submitted,

By: /Steven J. Reynolds/

Steven J. Reynolds (USPTO Reg. No. 61,445)*

Kevin H. Sprenger (USPTO Reg. No. 79,466)

Chandran B. Iyer (USPTO Reg. No. 48,434)

Erin Hadi (USPTO Reg. No. 79,904)*

Louay Meroueh (USPTO Reg. No. 81,304)*

sreynolds@daignaultiyer.com

ksprenger@daignaultiyer.com

cbiyer@daignaultiyer.com

ehadi@daignaultiyer.com

lmeroueh@daignaultiyer.com

DAIGNAULT IYER LLP

8229 Boone Boulevard

Suite 450

Vienna, VA 22182

**Not admitted in Virginia*

Attorneys for SoundClear Technologies LLC

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 October 28, 2025, on the following counsel of record for Petitioner:

Colin B. Heideman
Jeremy A. Anapol
Christie R.W. Matthaei
Nathan D. Reeves
Logan P. Young
Morgan, Lewis & Bockius LLP
colin.heideman@morganlewis.com
jeremy.anapol@morganlewis.com
christie.matthaei@morganlewis.com
nathan.reeves@morganlewis.com
logan.young@morganlewis.com
Amazon-SoundClear@morganlewis.com

Dated: October 28, 2025

Respectfully Submitted,

By: / Steven J. Reynolds /
Steven J. Reynolds
USPTO Reg. No. 61,445