

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICAN AIRLINES, INC. AND SOUTHWEST AIRLINE CO.,
Petitioners

v.

INTELLECTUAL VENTURES I, LLC AND
INTELLECTUAL VENTURES II, LLC,
Patent Owners

Case: IPR2025-00782
U.S. Patent No. 7,324,469

**PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION OF
KENNETH M. SCOTT UNDER 37 C.F.R. §42.10(c)**

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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313

Pursuant to Rule 42.10(c), Petitioner American Airlines, Inc. requests that the Board recognize Kenneth M. Scott as counsel *pro hac vice* during this proceeding.

I. TIME FOR FILING

This Motion is being filed in compliance with and pursuant to the Order-Authorizing Motion for Pro Hac Vice Admission in Case No. IPR2013-00639 [Paper 7] [“the Order”] and pursuant to the Board’s advanced authorization expressed in the Board’s Notice of Filing Date Accorded and Time for Filing Patent Owner’s Preliminary Response dated May 29, 2025 [Paper 5]. This Motion is timely because it is being filed no sooner than twenty-one (21) days after service of the Petition in this proceeding, which occurred on May 1, 2025.

II. STATEMENT OF FACTS

The following statement of facts show that there is good cause for the Board to recognize Mr. Scott as counsel *pro hac vice* in this proceeding.

Mr. Scott is an experienced litigation attorney and has an established familiarity with the subject matter at issue in this proceeding. Mr. Scott has been involved in numerous complex litigations in federal courts. Mr. Scott’s biography is attached hereto as Exhibit 1014.

Mr. Scott has reviewed U.S. Patent No. 7,324,469, and the petition already filed in this proceeding.

Further, Mr. Scott is counsel of record in the co-pending litigation between the parties entitled *Intellectual Ventures I, LLC and Intellectual Ventures II, LLC v. American Airlines, Inc*, before the U.S. District Court of Texas, Eastern Division, Civil Action No. 4:24-cv-00980-ALM, and, as such, is familiar with the subject matter at issue in this proceeding.

III. DECLARATION OF KENNETH M. SCOTT

Petitioner's Motion for *Pro Hac Vice* Admission is accompanied by the Declaration of Mr. Scott, filed as Exhibit 1015, attesting to the requirements laid out in the Board's Order Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639 (Paper 7).

For the foregoing reasons, as well as the reasons contained in the attached declaration, Petitioner respectfully requests admission of Kenneth Scott as counsel *pro hac vice* during this proceeding.

Dated: June 25, 2025

Respectfully submitted,

/s/John B. Campbell

John B. Campbell

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **PETITIONER, AMERICAN AIRLINES, INC.’S MOTION FOR *PRO HAC VICE* ADMISSION OF KENNETH M. SCOTT UNDER 37 C.F.R. §42.10(c)** has been served on Patent Owner via email on the following counsel of record for Patent Owner:

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Dated: June 25, 2025

By: /s/ John B. Campbell

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