UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUZHOU MOJAWA INTELLIGENT ELECTRONIC CO., LTD.,
Petitioner

v.

SHENZHEN SHOKZ CO., LTD.,
Patent Owner

Inter Partes Review No.: IPR2025-00843
U.S. Patent No. 11,310,582

PETITIONER'S NOTICE OF INTENT TO DESIGNATE BENJAMIN MUELLER AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY ELIGIBLE FOR AUTOMATIC *PRO HAC VICE* ADMISSION AS BACK-UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10

Pursuant to 37 C.F.R. § 42.10, Petitioner Suzhou Mojawa Intelligent Electronic Co., Ltd. ("Petitioner") respectfully files a Notice of Intent to designate Benjamin Mueller as a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission as backup counsel in this proceeding. The facts, supported by the attached Declaration of Benjamin Mueller in Support of Notice of Intent to Designate a Provisionally Recognized PTAB attorney as Back-up Counsel ("Mueller Decl."), establish Mr. Mueller as a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission in this proceeding.

I. STATEMENT OF FACTS

Lead counsel for Petitioner, James M. Heintz, is a registered practitioner (Reg. No. 41,828) and experienced in *inter partes* proceedings in the USPTO. Benjamin Mueller represents Petitioner in connection with the pending district court action captioned *Shenzhen Shokz Co., Ltd. v. Shenzhen Wenming Technology Co., Ltd. et al*, Case No. 1-24-cv-06717 (N.D. Ill.).

Mr. Mueller has assisted his colleagues at DLA Piper in proceedings before the Board, and he is familiar with its established practices. He has argued before PTAB judges in IPR proceedings. Further, he has experience in numerous patent infringement litigation matters in the federal court system. Mr. Mueller has experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on validity issues, preparing for depositions of

technical experts and fact witnesses, briefing claim construction issues, and drafting motions.

Mr. Mueller has an established familiarity with the subject matter at issue in this proceeding. The Petitioner wishes to continue using Mr. Mueller as counsel in this proceeding and has executed a Power of Attorney designating Mr. Mueller as backup counsel.

Mr. Mueller is a member in good standing of the State Bar of Illinois, the United States District Court for the Northern District of Illinois, and the United States Court of Appeals for the Federal Circuit. (Mueller Decl. at ¶ 3)

He has never been suspended or disbarred from practice before any court or administrative body. (*Id.* at ¶ 4) He has never had an application for admission to practice before any court or administrated body denied. (*Id*.) Nor has any court or administrative body imposed sanctions or contempt citations against him. (*Id*.)

Mr. Mueller has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of 37 C.F.R. (¶ 5) He attests to satisfying all requirements set forth by the Board for *pro hac vice* recognition of a provisionally recognized PTAB attorney. (¶ 1) He also acknowledges and agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq*., and to disciplinary jurisdiction under 37 C.F.R. §11.19(a). (¶ 5)

Mr. Mueller has previously applied to appear *pro hac vice* before the Office and has previously been recognized *pro hac vice* in a Board proceeding in IPR2021-01368, IPR2021-01369, IPR2021-01541, IPR2022-00023, and PGR2022-00009. (¶ 6) He has also not been subsequently denied permission to appear *pro hac vice* in a Board proceeding. (¶ 6)

II. ANALYSIS

The facts contained in the Statement of Facts above and Mr. Mueller's Declaration establish that Mr. Mueller is a provisionally recognized PTAB attorney and eligible for automatic *pro hac vice* admission in this proceeding under 37 C.F.R. § 42.10 as backup counsel. Lead counsel James M. Heintz is a registered practitioner and experienced in *inter partes* proceedings in the USPTO. Mr. Mueller is an experienced patent litigation attorney, and he has an established familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully files a Notice of Intent to designate Benjamin Mueller as a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission in this proceeding.

Petitioner's Mandatory Notices will be filed identifying Mr. Mueller as backup counsel.

Date: July 25, 2025

Respectfully submitted,

/s/ James M. Heintz
James M. Heintz
Reg. No. 41,828
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: + 1 703 773 4000
Fax: + 1 703 773 5000
Jim.Heintz@us.dlapiper.com

Attorney for Petitioner, Suzhou Mojawa Intelligent Electronic Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Intent to Designate Benjamin Mueller as a Provisionally Recognized PTAB Attorney Eligible for Automatic *Pro Hac Vice* Admission as Back-Up Counsel Pursuant to 37 C.F.R. § 42.10 and Exhibit 1029 have been served via electronic mail upon the following email addresses below:

Perkins-Service-Mojawa-Shokz-IPRs@perkinscoie.com

Date: July 25, 2025

Respectfully submitted,

/s/ James M. Heintz

James M. Heintz
Reg. No. 41,828
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: + 1 703 773 4000
Fax: + 1 703 773 5000
Jim.Heintz@us.dlapiper.com

Attorney for Petitioner, Suzhou Mojawa Intelligent Electronic Co., Ltd.