

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LTD.
and APPLE INC.,
Petitioners,

v.

MARLIN SEMICONDUCTOR LTD.,
Patent Owner.

Case No. IPR2025-00879
U.S. Patent No. 9,093,473

**CO-PETITIONER TSMC'S MOTION
FOR *PRO HAC VICE* ADMISSION OF JODIE W. CHENG
UNDER 37 C.F.R. § 42.10(c)**

Co-Petitioner Taiwan Semiconductor Manufacturing Company Ltd. respectfully requests that the Board recognize Jodie W. Cheng as counsel *pro hac vice* during the above-captioned proceeding.

A. Background

This Motion for Admission is being filed in compliance with and pursuant to the “Order-Authorizing Motion for Pro Hac Vice Admission” in *Unified Patents v. Parallel Iron*, Case No. IPR2013-00639, Paper 7 (Oct. 15, 2013), and the Board’s authorization provided in the Notice of Filing Date Accorded to Petition in the above captioned proceedings. *See* Paper 6, at 3-4 (May 15, 2025); *see also* Expanding Opportunities To Appear Before the Patent Trial and Appeal Board, 89 F.R. 82172, 82175 (Oct. 10, 2024); 37 C.F.R. § 42.10(c)(1).

B. Statement of Facts Showing Good Cause

Co-Petitioners have been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. § 42.10(c) pursuant to the Notice of Filing Date Accorded to Petition in the above captioned proceeding. Paper 6, at 3-4 (May 15, 2025).

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). “[W]here lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigation

attorney and has an established familiarity with the subject matter at issue in the proceeding.” *Id.* The facts, supported by the attached Declaration of Jodie W. Cheng in Support of Co-Petitioner TSMC’s Motion for *Pro Hac Vice* Admission (Ex. 1042), establish good cause for the Board to recognize Jodie W. Cheng *pro hac vice* during this proceeding.

Petitioners’ Lead Counsel, J. Preston Long, is a registered practitioner.

As demonstrated below and in the accompanying declaration (Ex. 1042), there is good cause for the Board to recognize Ms. Cheng *pro hac vice*.

Ms. Cheng has been practicing law for at least 11 years, with significant experience being in patent litigation. Ex. 1042 ¶ 8. Ms. Cheng is duly authorized to practice law in the State of California and is a member in good standing of the California bar. *Id.* ¶¶ 1-4. Further, Ms. Cheng has established familiarity with the subject matter at issue in this proceeding, including the patent-at-issue, the corresponding petition and prior art asserted, and all exhibits and all other documents filed. *Id.* ¶ 9. Ms. Cheng represents Co-Petitioner TSMC in related proceeding in the United States International Trade Commission, *Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof*, Inv. No. 337-TA-1443, which involves the patent at issue. Ex. 1042 ¶ 9.

Therefore, Co-Petitioner TSMC respectfully submits good cause exists for the Board to recognize Ms. Cheng as counsel *pro hac vice* during this proceeding.

Counsel for both Patent Owner Marlin Semiconductor Ltd. and Co-Petitioner Apple Inc. have indicated that they do not oppose Ms. Cheng's admission *pro hac vice*.

C. Declaration of Individuals Seeking to Appear

This Motion for Admission *Pro Hac Vice* is accompanied by the Declaration of Jodie W. Cheng, attached hereto as Exhibit 1042.

D. Conclusion

For the foregoing reasons, Co-Petitioner respectfully requests that the Board admit Jodie W. Cheng *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: June 27, 2025

/ J. Preston Long /

J. Preston Long, Ph.D., Reg. No. 65,125
Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Co-Petitioner TSMC's Motion for *Pro Hac Vice* Admission of Jodie W. Cheng Under 37 C.F.R. § 42.10(c)** was served on June 27, 2025, via email directed to counsel of record for Patent Owner and Co-Petitioner at the following:

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Patent Owner has consented to electronic service by email.

Dated: June 27, 2025

/William Esper/
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