

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

V.

HANNIBAL IP LLC,
Patent Owner.

Case IPR2025-01189
Patent No. 11,368,911 B2

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
JEFFREY M. SALTMAN PURSUANT TO 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Hannibal IP LLC respectfully seeks pro hac vice admission of Jeffrey M. Saltman as backup counsel for purposes of Case No. IPR2025-01189.

I. AUTHORIZATION FOR THIS MOTION

Section 37 C.F.R. 42.10(c) states as follows:

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. For example, where the lead counsel is a registered practitioner, a motion to appear pro hac vice by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter

at issue in the proceeding.

This motion satisfies the requirements of 37 C.F.R. § 42.10(c). In particular, lead counsel for the Patent Owner, Brian A. Carpenter, is a registered patent attorney, and there is good cause to admit Mr. Saltman as additional *pro hac vice* backup counsel for the Patent Owner. Mr. Saltman is intimately familiar with the substantive and technical issues involved in this proceeding. This motion is being filed no sooner than twenty-one (21) days after service of the petition.

II. STATEMENT OF FACTS

Hannibal IP LLC's lead counsel, Brian A. Carpenter, is a registered practitioner (Reg. No. 37,109).

Mr. Saltman is a member at the law firm Cole Schotz P.C. Exhibit 2013, which accompanies this Motion, is the Affidavit in Support of Patent Owner's Motion for Pro Hac Vice Admission of Jeffrey M. Saltman Pursuant to 37 C.F.R. § 42.10(c) (hereinafter referred to as "Saltman Aff.").

Mr. Saltman is an experienced litigation attorney has how been litigating patent cases for 19 years. Saltman Aff. at ¶ 4.

Mr. Saltman has been practicing since 2006 and has extensive experience litigating patent infringement cases in many different district courts across the United States. *Id.* at ¶ 3.

Mr. Saltman has been co-lead counsel in trial and argued at many patent-related hearings, including *Markman* hearings. *Id.* at ¶ 4.

Mr. Saltman has specialized knowledge of the subject matter at issue in this IPR because he has worked extensively on the Patent Owner's pleadings. *Id.* at ¶ 14.

Mr. Saltman is a member in good standing of the State Bars of Maryland and Washington, D.C. *Id.* at ¶ 5.

Mr. Saltman has never been suspended or disbarred from practice before any court or administrative body. *Id.* at ¶ 6.

No application of Mr. Saltman for admission to practice before any court or administrative body has ever been denied. *Id.* at ¶ 7.

No sanctions or contempt citations have ever been imposed against Mr. Saltman by any court or administrative body. *Id.* at ¶ 8.

Mr. Saltman has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R. § 42. *Id.* at ¶ 9.

Mr. Saltman understands that he will be subject to the USPTO Code of Professional Reasonability set forth in 37 C.F.R. §§ 10.20 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* at ¶ 10.

Mr. Saltman has not applied to appear *pro hac vice* in any other proceedings before the Office in the last three years. *Id.* at ¶ 11.

This motion was filed more than 21 days after service of the Petition in this proceeding.

**III. GOOD CAUSE EXISTS FOR THE PRO HAC VICE
ADMISSION OF MR. SALTMAN IN THIS PROCEEDING.**

This Motion for *pro hac vice* admission should be granted because good cause exists to recognize Mr. Saltman *pro hac vice* based on the facts contained herein, as supported by Mr. Saltman's accompanying Affidavit in Support of Motion for *Pro Hac Vice* Admission of Jeffrey M. Saltman (Ex. 2013).

Mr. Saltman is an experienced patent litigator with specialized knowledge of the issues in this proceeding based on his participation in the drafting of Patent Owner's pleadings. As a result, Hannibal IP LLC has a substantial need for Mr. Saltman's *pro hac vice* admission so that he can participate in an upcoming deposition scheduled for March 5, 2026.

III. CONCLUSION

Therefore, Patent Owner submits that there is good cause shown under 37 C.F.R. § 42.10(c) for the Board to recognize Jeffrey M. Saltman as counsel *pro hac vice* in this proceeding.

CERTIFICATE OF SERVICE

I, Brian A. Carpenter, hereby certify that on the 6th day of February, 2026,
the foregoing **PATENT OWNER'S MOTION FOR PRO HAC VICE
ADMISSION OF JEFFREY M. SALTMAN** was served on the following by
email:

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