

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Marvell Semiconductor, Inc.,

Petitioner,

v.

Credo Technology Group Ltd.,

Patent Owner.

Case No. IPR2025-01219
U.S. Patent No. 11,012,252

**PETITIONER’S UNOPPOSED MOTION FOR ADMISSION *PRO HAC*
VICE OF HANYUAN ZHANG**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Petitioner Marvell Semiconductor, Inc., (“Marvell”) requests that the Board admit Hanyuan Zhang *pro hac vice* in this proceeding. Patent Owner does not oppose.

As explained below, Ms. Zhang is an associate at the law firm representing Petitioner, and Petitioner seeks to provide Ms. Zhang with additional IPR experience in this matter.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

In accordance with 37 C.F.R. § 42.10(c), 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. “[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.” § 42.10(c). The facts, supported by the attached Declaration of Hanyuan Zhang in Support of Motion for Admission *Pro Hac Vice* (Ex-1055), here establish good cause for the Board to recognize Hanyuan Zhang *pro hac vice* during this proceeding.

1. Lead counsel, Harper Batts, is a registered practitioner.

2. Counsel, Hanyuan Zhang, is an Associate in the Intellectual Property Practice Group at Sheppard, Mullin, Richter, & Hampton LLP, and has been in the private practice of patent litigation for approximately three (3) years. Ex-1055, ¶8. Her practice has focused on patent litigation, including matters involving semiconductor-related technologies. She holds an engineering degree, and a substantial portion of her work consists of reading and analyzing patents and technical prior art, comparing disclosures to asserted claim elements, and assisting with the preparation of attorney work product and filings supported by the record.

3. Ms. Zhang is a member in good standing of the State Bar of California, and is admitted to the United States District Court for the Northern District of California. *Id.*, ¶1.

4. Ms. Zhang is concurrently applying to appear *pro hac vice* before the Office in IPR2025-01218 and IPR2025-01219. *Id.*, ¶7. She has not applied to appear *pro hac vice* in any other proceedings before the Office in the last three (3) years. *Id.*

5. Ms. Zhang is familiar with the subject matter and Petition at issue in this proceeding, including the patent, its prosecution history, and the identified references. *Id.*, ¶9. She assists lead counsel in representing Petitioner Marvell Semiconductor, Inc. in this proceeding.

III. CONCLUSION

For the foregoing reasons, Marvell respectfully requests that the Board admit Hanyuan Zhang *pro hac vice* in this proceeding.

Date: July 1, 2026

Respectfully submitted,

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Harper Batts/

Harper Batts (Reg. No. 56,160)
Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 1, 2026, a true and correct copy of the Petitioner's Unopposed Motion For Admission Pro Hac Vice of Hanyuan Zhang was served in entirety via email to all parties to this proceeding at the addresses indicated:

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