

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

MAXELL, LTD.,
Patent Owner

Case: IPR2025-01311

U.S. Patent No. 11,812,091

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

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Case IPR2025-01311

Patent No. 11,812,091

Patent Owner's Motion for *Pro Hac Vice* Admission

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Notice Letter to Samsung (July 7, 2021)
2002	Follow-up Notice Letter to Samsung (December 29, 2021)
2003	Docket Navigator Time to Trial Statistics for the Eastern District of Texas
2004	Docket Control Order, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:25-cv-00052-RWS (E.D. Tex.)
2005	Jury Trial Transcript, Vol. 4, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:23-cv-00092-RWS (E.D. Tex.)
2006	Complaint, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:25-cv-00052-RWS (E.D. Tex.)
2007	Follow-up Notice Letter to Samsung (April 21, 2025)
2008	Law360 Article, "Maxell Settles Patent Suit Against Apple Over Mobile Tech"
2009	Law360 Article, "Maxell Scores \$43M EDTX Jury Win In ZTE Patent Trial"
2010	Law360 Article, "Maxell, Huawei Reach Terms To End Smartphone Patent Suit"
2011	Hudson Institute Article, "Google's Loss to Sonos Settles It, Big Tech Has an IP Piracy Problem"
2012	PatentRenewal.com Article, "which-companies-hold-the-most-patents-in-the-world"
2013	Motion for Partial Summary Judgment of Validity Based on Sotera Stipulations, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:23-cv-00092-RWS (E.D. Tex.)
2014	Follow-up Notice Letter to Samsung (November 28, 2024)
2015	Petitioner's Invalidity Contentions (November 28, 2025)
2016	US Patent Application Publication No. US 2008/0184297
2017	Defendants' PR 4-2 Disclosures
2018	Declaration of Tariq Javed in Support of Motion for <i>Pro Hac Vice</i> Admission

Patent Owner Maxell, Ltd. ("Patent Owner") respectfully requests that the Board admit Tariq Javed as backup counsel *pro hac vice* in this proceeding. Patent Owner seeks the counsel of Mr. Javed due to his experience in representing Patent Owner in patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding and the related district court litigation. Therefore, Mr. Javed meets the requirements of "an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding" under 37 C.F.R. § 42.10(c). This motion follows the guidelines set forth in IPR2013-00639, Paper 7, entered October 15, 2013 ("Order"). Counsel for Petitioner has informed the undersigned that the Petitioner does not oppose this motion.

I. TIME FOR FILING

Pursuant to the Order, this motion for *pro hac vice* admission is being filed no sooner than twenty-one (21) days after service of the petition.

II. STATEMENT OF FACTS

Pursuant to the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Javed *pro hac vice*.

Lead counsel for this proceeding, Robert G. Pluta, is a registered practitioner (Registration No. 50,970).

Mr. Javed is an experienced litigation attorney, and has been involved in

numerous patent infringement cases in the U.S. International Trade Commission and in federal District Courts across the country. He has experience in various aspects of patent infringement matters including trials, Markman hearings, and summary judgment hearings. Mr. Javed is a member in good standing of the District of Columbia Bar and the New York Bar. Mr. Javed has not been suspended or disbarred from practice, never had any application for admission to practice denied, nor had any sanctions or contempt citations imposed against him.

Mr. Javed is a counsel for the Plaintiff, which includes Patent Owner, in a co-pending litigation, *Maxell, Ltd. v. Samsung Electronics Co., Ltd.*, and *Samsung Electronics America, Inc.*, Case No. 5:25-cv-00052-RWS, pending in the Eastern District of Texas. That litigation involves U.S. Patent No. 11,812,091 (“the ’091 Patent”), the same patent at issue in this proceeding. In his role in the co-pending litigation, Mr. Javed has reviewed and is familiar with the ’091 Patent, the infringement theories, asserted prior art references, and invalidity claim charts. Further, Mr. Javed has been involved and is familiar with the factual and legal arguments at issue in that case. As such, Mr. Javed has established familiarity with the subject matter at issue in this proceeding.

Mr. Javed has read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials set forth in part 42 of 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth

in 37 C.F.R. §§ 11.101 et. seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Mr. Javed's previous *pro hac vice* motion in Proceeding No. IPR2022-01459 filed in the last three years was granted. Mr. Javed is also concurrently applying to appear *pro hac vice* in Proceeding Nos. IPR2025-01310 and IPR2025-01314.

Patent Owner has expended significant financial resources in the co-pending litigation with Mr. Javed as counsel, and Patent Owner wishes to continue using Mr. Javed in this proceeding.

As such, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Javed as counsel *pro hac vice* during this proceeding

III. AFFIDAVIT OF DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Mr. Javed (Exhibit 2018), which attests to the requirements for *pro hac vice* admission set forth in IPR2013-00639, Paper 7, dated Oct. 15, 2013.

IV. PRO HAC VICE ADMISSION FEE

The required fee under 37 C.F.R. § 42.15(e) in the amount of \$269.00 is being paid by credit card.

V. CONCLUSION

Accordingly, Patent Owner submits that there is good cause under 37 C.F.R.

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§ 42.10(c) for the Board to admit Tariq Javed as counsel *pro hac vice* and to authorize Mr. Javed to represent Patent Owner as back-up counsel in this proceeding.

Dated: April 16, 2026

Respectfully submitted,

/Robert G Pluta Reg No 50970 /
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April, 2026, a copy of the attached **PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF TARIQ JAVED PURSUANT TO 37 C.F.R. § 42.10(c)** was served by electronic mail to the attorneys of record, at the following addresses:

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Respectfully submitted,

Date: April 16, 2026

By:

/Robert G. Pluta/

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