UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

RADIAN MEMORY SYSTEMS, LLC,
Patent Owner.

_____

Case IPR2025-01350
Patent 11,740,801

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PATENT OWNER RADIAN MEMORY SYSTEMS, LLC'S NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY COLETTE WOO AS BACKUP COUNSEL UNDER 37 C.F.R. § 42.10(c)(2)

EXHIBIT LIST	
2001	Lowenstein Declaration In Support of Notice of Intent
2002	Woo Declaration In Support of Notice of Intent
2003	Courtney Declaration In Support of Notice of Intent
2004	Zhou Declaration In Support of Notice of Intent

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(c)(2), Patent Owner Radian Memory Systems, LLC ("Patent Owner") files this notice of its intent to designate provisionally recognized PTAB attorney Colette Woo (Ms. Woo) as backup counsel. The facts set forth below and the accompanying Declaration of Colette Woo, Ex. 2002 (Woo Decl."), support her *pro hac vice* admission.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c), 37 C.F.R., provides that:

> (i) Any counsel who is not a registered practitioner, who has been previously recognized pro hac vice in a Board proceeding, and who has not subsequently been denied permission to appear pro hac vice in a Board proceeding shall be considered a provisionally recognized PTAB attorney. Provisionally recognized PTAB attorneys shall be eligible for automatic pro hac vice admission in subsequent proceedings, subject to the following conditions.
>
> (ii) If a party seeks to be represented in a proceeding by a provisionally recognized PTAB attorney, that party may file a notice of intent to designate a provisionally recognized PTAB attorney as back-up counsel. No fee is required for such a notice. The notice shall:
>
> (A) Identify a registered practitioner who will serve as lead counsel, and
>
> (B) Be accompanied by a certification in the form of a declaration or affidavit in which the provisionally recognized PTAB attorney attests

to satisfying all requirements set forth by the Board for pro hac vice recognition of a provisionally recognized PTAB attorney and agrees to be subject to the USPTO Rules of Professional Conduct set forth in §§ 11.101 et seq. of this chapter and disciplinary jurisdiction under § 11.19(a) of this chapter.

As enumerated in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) ("*Unified Patents* Order"), the Board has further required that counsel seeking to appear *pro hac vice* submit an affidavit or declaration attesting to the following:

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear 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.;

vi. The individual will be subject to the U.S.P.T.O. 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);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Colette Woo, submitted herewith as Exhibit 2002, Patent Owner requests the automatic *pro hac vice* admission of Colette Woo in this proceeding:

1. Patent Owner's lead counsel, Kenneth Weatherwax, is a registered practitioner (Reg. No. 54,528).

2. Ms. Woo is an associate at the law firm of Lowenstein & Weatherwax LLP. Ex. 2002 ¶ 8.

3. The majority of Ms. Woo's practice has consisted of patent related matters such as PTAB litigations. *Id*. ¶ 9.

4. Ms. Woo's experience in post-grant patent proceedings includes drafting patent owner responses, taking depositions, and presenting oral arguments before the Board. *Id*. ¶ 10. Representative matters where Ms. Woo is or was actively involved include:

- *Samsung Electronics Co., Ltd. et al v. Radian Memory Systems LLC* (IPR2025-01266, -01289, -01321, -01376, -01377, -01378).
- *International Business Machines Corporation v. Security First Innovations, LLC* (IPR2025-01200, -01201, -01202).
- *Amazon.com Inc. et al v. DivX, LLC* (IPR2025-01062, -01222, -01223).
- *Infineon Technologies Americas Corp. v. MOSAID Technologies Inc.* (IPR2025-01171).
- *NVIDIA Corporation v. Neural AI, LLC* (IPR2025-00606, -00608, -00609, -00610).
- *DirecTV, LLC v. Entropic Communications, LLC* (IPR2024-01061, -01064).
- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2025-00180, -00181, -00182; IPR2024-00432, -00433, -00434, -00435, -00436, -00437, -00438, -00439, -00440, -00446, -00452).
- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00462, -00560).
- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).

- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).
- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).
- *Apple Inc. v. SEVEN Networks, LLC* (IPR2020-00236, -00254, -00255, -00280, -00281, -00285, -00584, -00506, -00507).

Ex. 2002 ¶ 10.

5. Ms. Woo has an established familiarity with the subject matter at issue in this proceeding. *Id*. ¶ 17. Ms. Woo has reviewed the Patent at issue as well as the Petition and the relevant art. *Id*.

6. Ms. Woo is a member in good standing of the State Bar of California. *Id*. ¶¶ 1, 2.

7. Ms. Woo has never been suspended or disbarred from practice before any court or administrative body. *Id*. ¶ 3.

8. No application of Ms. Woo for admission to practice before any court or administrative body has ever been denied. *Id*. ¶ 4.

9. No sanctions or contempt citations have ever been imposed against Ms. Woo by any court or administrative body. *Id*. ¶ 5.

10. Ms. Woo 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. Ex. 2002 ¶ 6.

11. Ms. Woo understands that she will be subject to the U.S.P.T.O. 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). Ex. 2002 ¶ 7.

12. The following are the most recent prior proceedings in which Ms. Woo was recognized *pro hac vice* before the Board, with admission granted on November 22, 2024:

- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2024-00432, -00435, -00438, -00446).

Ex. 2002 ¶ 11.

13. Ms. Woo has previously been admitted to appear, *pro hac vice*, in the following matters before the U.S.P.T.O. within the last three years:

- *Comcast Cable Communications, LLC v. Entropic Communications, LLC* (IPR2024-00432, -00435, -00438, -00446).
- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00462).
- *Google LLC v. Security First Innovations LLC* (IPR2024-00214, -00215).

- *Samsung Electronics Co., Ltd. v. Smart Mobile Techs. LLC* (IPR2022-01248).
- *Apple, Inc. v. Smart Mobile Techs. LLC* (IPR2022-00807).
- *Unified Patents, LLC, v. DivX, LLC* (IPR2021-01476).

Ex. 2002 ¶ 12.

14. Ms. Woo has been previously designated a provisionally recognized *pro hac vice* PTAB attorney in the following matters:

- *International Business Machines Corporation v. Security First Innovations, LLC* (IPR2025-01200, -01201, -01202).
- *Amazon.com Inc. et al v. DivX, LLC* (IPR2025-01062, -01222, -01223).
- *NVIDIA Corporation v. Neural AI, LLC* (IPR2025-00606, -00608, -00609, -00610).

Id. ¶ 13.

15. Ms. Woo has previously applied for admission, *pro hac vice*, in the following matters before the U.S.P.T.O. which were terminated before the application was granted:

- *DISH Network LLC v. Entropic Communications LLC* (IPR2024-00560).

Id. ¶ 14.

16. Ms. Woo is concurrently applying for *pro hac vice* admission in the following matters:

- *Samsung Electronics Co., Ltd. et al v. Radian Memory Systems LLC* (IPR2025-01266, -01289, -01321, -01376, -01377, -01378).

Id. ¶ 15.

17. Other than the matters identified in ¶¶ 12-16, *supra*, Ms. Woo has not applied to appear *pro hac vice* in any other proceedings before the U.S.P.T.O. in the last three years.

IV. CONCLUSION

Upon being deemed admitted *pro hac vice* under 37 C.F.R. § 42.10(2)(iii), Patent Owner will file updated mandatory notices accordingly. And Ms. Woo will keep the Board informed of sanctions, changes to good standing at a bar, or any other event that renders materially inaccurate or incomplete any representation that she made to the Board in connection with this request for *pro hac vice* notice. Ex. 2002 ¶ 18.

Respectfully submitted,

/ Kenneth J. Weatherwax /
Kenneth J. Weatherwax (Reg. No. 54,528)
LOWENSTEIN & WEATHERWAX LLP

Date: October 3, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

PATENT OWNER RADIAN MEMORY SYSTEMS, LLC'S NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY COLETTE WOO AS BACKUP COUNSEL UNDER 37 C.F.R. § 42.10(c)(2)

EXHIBIT 2002

The names and address of the parties being served are as follows:

James M. Glass	jimglass@quinnemanuel.com
John T. Mckee	johnmckee@quinnemanuel.com
Gregory M. Miraglia	gregmiraglia@quinnemanuel.com

Respectfully submitted,

/ Gwynneth Orlino /

Date: October 3, 2025