

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICAN AIRLINES, INC. and
SOUTHWEST AIRLINES CO.,

Petitioners

v.

INTELLECTUAL VENTURES I LLC,

Patent Owner

IPR2025-01510
U.S. Patent No. 10,103,845

**PETITIONER'S NOTICE OF INTENT TO DESIGNATE KENNETH
SCOTT, A PROVISIONALLY RECOGNIZED PTAB ATTORNEY, AS
BACK-UP COUNSEL UNDER 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

EXHIBIT LIST

Exhibit No.	Description	Previously Submitted
1001	U.S. Patent No. 10,103,845 (the “’845 Patent”)	X
1002	Prosecution History of the ’845 Patent	X
1003	Declaration of William C. “Chuck” Easttom in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 10,103,845	X
1004	Curriculum Vitae of William C. “Chuck” Easttom	X
1005	U.S. Patent Application No. 2002/0154705 (“Walton”)	X
1006	U.S. Patent No. 7,130,592 (“Ishikawa”)	X
1007	U.S. Patent No. 7,885,178 (“Maltsev”)	X
1008	U.S. Patent No. 7,916,803 (“Gardner”)	X
1009	U.S. Patent No. 7,324,429	X
1010	International Patent App. No. WO2003003646A2	X
1011	2003 Texas Instruments White Paper	X
1012	2009 Cisco Presentation re: 802.11	X
1013	Correspondence to Brandon R. Theiss dated October 23, 2025 regarding <i>Sotera</i> Stipulation from American Airlines	X
1014	Correspondence to Brandon R. Theiss dated October 23, 2025 regarding <i>Sotera</i> Stipulation from Southwest Airlines	X
1015	Declaration of Kenneth M. Scott in Support of Petitioner’s Notice of Intention to Designate a Provisionally Recognized PTAB Attorney as Back-Up Counsel, Dated November 3, 2025	

Pursuant to 37 C.F.R. § 42.10 (c)(2), Petitioner, American Airlines, Inc. (“American”), hereby submits this notice of intent to designate Kenneth M. Scott, a provisionally recognized PTAB attorney, as back-up counsel. Mr. Scott has been admitted to practice *pro hac vice* in the past in IPR2025-00782. *See* IPR2025-00782, Paper 8 (August 14, 2025).

I. LEAD COUNSEL

John B. Campbell, Reg. No. 54,665, will serve as lead counsel in this matter.

II. DECLARATION

Kenneth M. Scott satisfies 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 37 C.F.R. §§ 11.101 *et seq.* and disciplinary rules under 37 C.F.R. § 11.19(a). This notice is accompanied by a Declaration of Kenneth M. Scott attached hereto as Exhibit 1015.

Petitioner respectfully requests admission of Mr. Scott *pro hac vice* as back-up counsel in this case.

DATED: November 4, 2025

Respectfully submitted,

/s/John B. Campbell

John B. Campbell

Registration No. 54,665

jcampbell@McKoolSmith.com

303 Colorado Street, Suite 2100

Austin, Texas 78701

Tel: (512) 692-8700

Fax: (512) 692-8744

Kenneth M. Scott (Texas Bar No.

24137497 - admission *pro hac vice* to
be requested)

kscott@McKoolSmith.com

303 Colorado Street, Suite 2100

Austin, Texas 78701

Tel: (512) 692-8700

Fax: (512) 692-8744

COUNSEL FOR PETITIONER

AMERICAN AIRLINES, INC.

-and-

Keith D. Harden (Reg. No. 74,472)

kharden@munckwilson.com

Daniel E. Venglarik (Reg. No. 39,409)

dvenglarik@munckwilson.com

S. Wallace Dunwoody (Texas Bar No.

24040838 - admission *pro hac vice* to
be requested)

wdunwoody@munckwilson.com

Michael C. Wilson (Texas Bar No.

21704590 - admission *pro hac vice* to
be requested)

mwilson@munckwilson.com

Munck Wilson Mandala, LLP

2000 McKinney Ave., Ste. 1900

Dallas, Texas 75201

U.S. Patent No. 10,103,845

IPR2025-01510

Tel: (972) 628-3600

Fax: (972) 628-3616

*COUNSEL FOR PETITIONER
SOUTHWEST AIRLINES CO.*

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Sections 42.6 and 42.106, that a complete copy of the attached **Notice of Intent to Designate Kenneth M. Scott, a Provisionally Recognized PTAB Attorney, as Back-Up Counsel Under 37 C.F.R. §42.10(c)**, including exhibit **Nos. 1015** are being served on 4th day of November, 2025, the same day as the filing of the above-identified document in the United States Patent and Trademark Office/Patent Trial and Appeal Board, upon Patent Owner by serving the correspondence address of record with the USPTO as follows:

Brandon Theiss

btheiss@vklaw.com

Daniel Golub

dgolub@vklaw.com

Ryan W. O'Donnell

RODonnell@vklaw.com

Dawn C. Kerner

dkerner@vklaw.com

Russell Rigby

rrigby@intven.com

Dated: November 4, 2025

/s/ John B. Campbell

John B. Campbell

Reg. No. 54,665