Paper No. 6

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.,

Petitioner,

v.

WACOM CO. LTD.,

Patent Owner.

Patent No. 9,280,220
Issued: Mar. 8, 2016
Filed: Jan. 9, 2015

Inventors: Shahrooz Shahparnia et al.
Title: PULSE- OR FRAME-BASED COMMUNICATION USING ACTIVE STYLUS

Inter Partes Review No. IPR2025-01556

PETITIONER SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.'S MOTION FOR *PRO HAC VICE* ADMISSION OF SHANNON BJORKLUND UNDER 37 C.F.R. § 42.10(c)

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Shenzhen, Qianfenyi Intelligent Technology Co., Ltd., ("Maxeye"), by and through its attorneys, respectfully requests that the Board admit Shannon Bjorklund *pro hac vice* in this proceeding.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 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.

Further, the Board requires that a motion for *pro hac vice* admission be filed in accordance with the "NOTICE OF FILING DATE ACCORDED TO PETITION AND TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE – 37 C.F.R. § 42.10" in *Shenzhen Qianfenyi Intelligent Technology Co., Ltd. v. Wacon Co. Ltd.*, Case No. IPR2025-01556 ("Notice of Filing Date"). The Notice of Filing Date states that the motion must "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding," and "[b]e accompanied by an affidavit or declaration of the individual seeking to appear 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 the C.F.R;

vi. The individual will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§10.20 *et seq.1* 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.[1]

[1] The USPTO Code of Professional Responsibility in 37 C.F.R. § 10.20 et seq. was

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Shannon Bjorklund submitted herewith, Petitioner Maxeye submits that a showing of good cause has been made and respectfully requests the *pro hac vice* admission of Shannon Bjorklund in this proceeding:

1. Maxeye's lead counsel, Mark A. Miller is a registered practitioner (Reg. No. 44,944).
2. Ms. Bjorklund is Partner at the law firm of Dorsey & Whitney, LLP ("Dorsey") and is counsel of record for Petitioner Maxeye in the related district court litigation, *Wacom Co. Ltd. v. Shenzhen Qianfenyi Intelligent Technology Co., Ltd.*, Civil No. 2:24-cv-702-JRG (E.D.T.X.) ("E.D.T.X. Litigation"). Ms. Bjorklund joined Dorsey as an Associate in January 2011. (Declaration of Shannon Bjorklund in Support of Petitioner's Motion for *pro hac vice* Admission of Shannon Bjorklund under 37 C.F.R. § 42.10(c).)

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replaced by the USPTO Rules of Professional Conduct in 37 C.F.R. § 11.101 et seq., effective May 3, 2013.

3. Ms. Bjorklund is a litigation attorney with specific experience in patent law and patent law litigation. Ms. Bjorklund has represented clients in numerous patent infringement actions across the country. (*Id.*)

4. Ms. Bjorklund is a member in good standing of the state of Minnesota. (*Id.*)

5. Ms. Bjorklund has never been suspended or disbarred from practice before any court or administrative body. (*Id.*)

6. No application filed by Ms. Bjorklund for admission to practice before any court or administrative body has ever been denied. (*Id.*)

7. No sanctions or contempt citations have been imposed against Ms. Bjorklund by any court or administrative body. (*Id.*)

8. Ms. Bjorklund has read and agrees to comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R. (*Id.*)

9. Ms. Bjorklund understands that she will be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 *et seq*. and disciplinary jurisdiction under 37 C.F.R. §11.19(a). (*Id.*)

10. Ms. Bjorklund has not applied to appear *pro hac vice* in any proceedings before the United States Patent and Trademark Office in the last

three (3) years, although she has applied for and was granted *pro hac vice* admission more than three years ago. (*Id.*)

11. Ms. Bjorklund has an established familiarity with the subject matter at issue in this, and the other related proceeding noted below. Ms. Bjorklund has familiarity with the subject matter at issue in this proceeding and in the related E.D.T.X. Litigation in which U.S. Patent Nos. 9,280,220; 9,977,519; 10,108,277; 10,437,356; 9,690,399; 9,933,866; and 10,768,720 were asserted by the Patent Owner in August 2024. Since that time, she has closely studied the asserted patents, participated in discovery related to the same, and submitted invalidity contentions for the foregoing patents. Ms. Bjorklund has acquired substantial understanding of the underlying issues at stake in this matter.

12. There would be no need to update the Power of Attorney or Mandatory Notices upon granting of this motion, because Ms. Bjorklund was listed in those previously-filed documents with the expectation that this motion would be brought.

IV. GOOD CAUSE EXISTS FOR PRO HAC VICE ADMISSION OF SHANNON BJORKLUND

The facts outlined above in the Statement of Facts, and contained in the Declaration of Shannon Bjorklund, establish that there is good cause to admit Ms.

Bjorklund *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Maxeye's lead counsel is a registered practitioner. Ms. Bjorklund has specific experience in litigating patent matters and has an established familiarity with the subject matter at issue in this, and the other related proceeding noted in Section III., Paragraph 11, *supra*.

V. CONCLUSION

In light of the foregoing, Maxeye respectfully requests that the Board admit Shannon Bjorklund *pro hac vice* in this proceeding.

Dated: October 10, 2025

Respectfully submitted,

/Mark Miller/
Mark Miller
Registration No. 44,944
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing document was served via email to Petitioner by serving the correspondence email addresses of record as follows:

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