

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

AQ CORPORATION,
Patent Owner.

Case No. IPR2026-00231

U.S. PATENT NO. 11,303,011

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF ADAM JANES**

TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 11,303,011 (“’011 Patent”)
1002	Declaration of David K. Choi, Ph.D
1003	<i>Curriculum Vitae</i> of David K. Choi, Ph.D
1004	Excerpted File History of U.S. 11,303,011 (App. No. 17/105,012)
1005	PCT Publication 2017/175886 (“SeongPCT”)
1006	Certified English Translation of PCT Publication 2017/175886 (“Seong”)
1007	U.S. Pat. App. Pub. No. 2019/0109373 (“Ahn”)
1008	U.S. Patent No. 10,269,005 (“005Lee”)
1009	Korean Patent Publication 10-2017-0093670 (“ChoKPP”)
1010	Certified English Translation of Korean Patent Publication 10-2017-0093670 (“Cho”)
1011	U.S. Pat. App. Pub. No. 2017/0228721 (“721Lee”)
1012	U.S. Pat. App. Pub. 2018/0198209 (“Kang”)
1013	Comparison of the specifications of U.S. Patent No. 11,303,011 (“’011 Patent”) and U.S. Pat. App. Pub. 2018/0198209 (“Kang”)
1014	U.S. Pat. App. Pub. No. 2010/0090824 (“Rowell”)
1015	Exhibit A to Patent Owner’s Disclosure of Asserted Claims and Infringement Contentions in <i>AQ Corporation v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:25-cv-01012-JRG (EDTX)

Exhibit No.	Description
1016	William H. Hayt, Jr. and Jack E. Kemmerly, Engineering Circuit Analysis (1993)
1017	Mohamed M. El Rayes, et al., "A Review on Wireless Power Transfer," IJETT Vol. 40. No. 5 (2016)
1018	Sung-Gu Kang, et al., "Near-Field Communication in Biomedical Applications," Sensors (2021)
1019	Zebra, RFID Inlay Placement/Power Guidelines (2014)
1020	Constantine A. Balanis, "The Evolution of Antenna Technology," IEEE Antenna & Propagation Magazine (2024)
1021	G. Stojanovic and Lj. Zivanov, "Comparison of Optimal Design of Different Spiral Inductors," MIEL Vol. 2 (2004)
1022	Chandrasekharan Nataraj, et al., "General Analysis of Resonance Coupled Wireless Power Transer (WPT) Using Inductive Coils," Technical Gazette 25, 3 (2018).
1023	Zachariah Peterson, "How to Design a Printed Circuit Board in 10 Easy Steps," (2025), https://resources.altium.com/p/10-easy-steps-comprehensively-designing-circuit-board-altium-designer
1024	"The Discovery of Radio Waves – 1888," Spark Museum, http://www.sparkmuseum.com/BOOK_HERTZ.HTM
1025	"How Do Checkpoint Labels and Hard Tags work?," Loss Prevention Systems, https://www.losspreventionsystems.com/checkpoint-labels-hard-tags-work/
1026	"Qi: Mobile Charging Empowered," Wireless Power Consortium, https://www.wirelesspowerconsortium.com/standards/qi-wireless-charging/

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Exhibit No.	Description
1027	“Wireless Charging,” NFC Forum, https://nfc-forum.org/build/specifications/wireless-charging/
1028	“Qi Wireless Charging,” Lenhardt, https://ib-lenhardt.com/kb/qi-wireless-charging
1029	U.S. Patent No. 649,621
1030	U.S. Patent No. 1,119,732
1031	U.S. Patent No. 4,937,585
1032	Chinese Patent No. CN209266128
1033	Korean Patent No. KR20180113064
1034	PCT WO 2019/070090
1035	Korean Patent No. KR101832344
1036	U.S. Patent No. 4,313,152
1037	U.S. Patent No. 1,563,731
1038	Performance Specification: MIL-PRF-55110F (1993)
1039	Letter from A. Janes to N. Lenning, March 5, 2026
1040	Declaration Adam Janes

Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Petitioners" or "Samsung") hereby move under 37 C.F.R. § 42.10(c) for the admission *pro hac vice* of Adam Janes in the present *inter partes* review so that he may be appointed back up counsel for Samsung.

I. INTRODUCTION AND BACKGROUND

Authorization for this motion was provided by PTAB in the January 29, 2026 Notice of Filing Date Accorded to Petition (Paper 4). Counsel for Samsung consulted with Counsel for Patent Owner AQ Corporation ("AQ Corp."), and AQ Corp. agreed it does not oppose the present motion for *pro hac vice* admission for Mr. Janes. Therefore, the present motion is proper at this time. As explained further below, Mr. Janes is an experienced litigation attorney with an established familiarity with the subject matter at issue in this *inter partes* review.

"[W]here 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." 37 C.F.R. § 42.10(c). A motion for *pro hac vice* admission must:

- a. Contain a statement of facts showing that there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding.

- b. Be accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:
 - a. Membership in good standing of the Bar of at least one State or the District of Columbia;
 - b. No suspensions or disbarments from practice before any court or administrative body;
 - c. No application for admission to practice before any court or administrative body ever denied;
 - d. No sanctions or contempt citations imposed by any court or administrative body;
 - e. The individual seeking to appear has read and will comply with the Office rules;
 - f. The individual will 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);
 - g. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and
 - h. Familiarity with the subject matter at issue in the proceeding.

Unified Patents, Inc. v. Parallel Iron, LLC, Case No. IPR2013-00639, 2013 WL 8700556 (P.T.A.B. Oct. 15, 2013).

II. STATEMENT OF FACTS SHOWING GOOD CASE FOR THE PRESENT MOTION

Based on the following facts, supported by Mr. Janes's declaration, *See* Ex1040, Samsung requests that Mr. Janes be admitted *pro hac vice* in this proceeding. Samsung's lead counsel is a registered practitioner (Paper No. 1 at 2 and Paper No. 2 at 2).

a. Mr. Janes Meets the Requirements for Admission *Pro Hac Vice*

Mr. Janes has more than 7 years of experience as a litigation attorney specializing in patent litigations, representing clients in patent litigation matters in various United States District Courts.

Mr. Janes is very familiar with U.S. Patent No. 11,303,011 due to the underlying litigation: *AQ Corporation v. Samsung Electronics Co., Ltd., et al.*, No. 2:25-cv-01012-JRG (EDTX).

Mr. Janes is a member in good standing of the Bar of the State of Illinois (State Bar No. 6329860).

Mr. Janes has never been suspended or disbarred from practice before any court or administrative body.

Mr. Janes has never had a court or administrative body deny his application for admission to practice.

Mr. Janes has never been sanctioned or cited for contempt by any court or administrative body.

Mr. Janes 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 47 of the 37 C.F.R.

Mr. Janes agrees to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101, *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.199(a).

In the last three years, Mr. Janes has not applied to appear *pro hac vice* in any proceedings before the United States Patent and Trademark Office.

III. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. JANES IN THIS PROCEEDING

The Board may recognize *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and any other conditions the Board may impose. 37 C.F.R. § 42.10(c). Samsung's lead counsel, Robert A. Appleby (Reg. No. 40,897), is a registered practitioner before the Board. Based on the facts contained herein, good cause exists to admit Mr. Janes *pro hac vice*.

Mr. Janes has over 7 years of patent litigation experience. He has represented clients in matters related to wireless communications, instruction set architecture, consumer electronics, medical devices, computer hardware and software, power

machines, and a variety of mechanical devices, among others, and has significant experience in patent litigation matters. Mr. Janes has been Samsung's litigation counsel since before the institution of these *inter partes* review proceedings, and Mr. Janes was, and is, actively involved with the strategy and fact development in the co-pending litigation between Patent Owner and Samsung, including regarding U.S. Patent No. 11,303,011. In view of Mr. Janes's extensive knowledge of the subject matter of this proceeding, and in view of the interrelatedness of this proceeding and the co-pending district court litigation, Samsung has a substantial need for Mr. Janes's *pro hac vice* admission and his involvement in the continued prosecution of this proceeding.

IV. CONCLUSION

For all foregoing reasons, there is good cause to admit Mr. Janes on a *pro hac vice* basis to serve as back up counsel for Samsung. Therefore, Samsung respectfully requests that this Unopposed Motion for *Pro Hac Vice* Admission for Mr. Janes be granted.

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Date: August 24, 2026

Respectfully submitted,

/s/ Robert A. Appleby

Robert A. Appleby, P.C.

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), it is hereby certified that on August 24, 2026, an electronic copy of this Petitioner's Motion for *Pro Hac Vice* Admission and supporting exhibit were served via email on Patent Owner's counsel of record in this proceeding:

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Date: August 24, 2026

/s/ Robert A. Appleby

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