

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LUMI LEGEND CORPORATION,
Petitioner,

v.

MANEHU PRODUCT ALLIANCE, LLC,
Patent Owner.

Case No. PGR2024-00014

Patent No. 11,781,703

**PATENT OWNER'S MOTION FOR RAMSEY AL-SALAM TO APPEAR
PRO HAC VICE UNDER 37 C.F.R. § 42.10**

Patent Owner Manehu Product Alliance, LLC (“Patent Owner” or “Manehu”) moves the Board to admit Ramsey Al-Salam as backup counsel *pro hac vice* in the above-captioned post-grant review of U.S. Patent No. 11,781,703. Petitioner seeks Mr. Al-Salam’s assistance because of his experience in representing Manehu in other patent-related matters and because of his experience and knowledge regarding the substantive and technical issues involved in this proceeding.

This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 3) and provides the information required by the Board's “Order, Authorizing Motion for Pro Hac Vice Admission, 37 C.F.R. §42.10” in Case IPR2013-00639, Paper 7 (“Pro Hac Order”). Pursuant to the *Pro Hac* Order, Part 2(a), Petitioner states that good cause exists for Mr. Al-Salam to appear *pro hac vice* in connection with the above-captioned post-grant review because:

(1) Mr. Al-Salam is a Partner at the law firm Perkins Coie LLP and a member in good standing of the Washington State Bar and California State Bars;

(2) Mr. Al-Salam is a patent litigator with 35 years of litigation experience representing clients, including Manehu.

(3) Mr. Al-Salam regularly litigates patent cases before the various district courts. He has experience in jury and bench trials in intellectual property matters, and in *Markman* hearings and oral arguments in patent litigation matters. Mr. Al-

Salam's biography is attached as Exhibit A of the accompanying Declaration. Mr. Al-Salam is assisting with representation of Manehu in related litigation *CKnapp Sales, Inc. d/b/a VIVO v. Manehu Product Alliance, LLC d/b/a MantelMount*, 1-23-cv-16181 (NDIL) and is familiar with the subject matter of this proceeding.

(4) Karl L. Klassen, lead counsel for Petitioner with respect to the post-grant review, is a partner at Perkins Coie LLP and a registered practitioner before the United States Patent and Trademark Office (Reg. No. 54,224).

The information required by the *Pro Hac* Order, Part 2(b)(i)-(viii), can be found in the accompanying Declaration of Ramsey Al-Salam in support of this Motion.

The undersigned attorney welcomes a telephone call should the Office have any requests or questions.

Dated: May 8, 2024

Respectfully submitted,

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Ramsey Al-Salam, Pro-Hac Vice
Attorneys for PATENT OWNER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of **PATENT OWNER'S MOTION FOR RAMSEY AL-SALAM TO APPEAR *PRO HAC VICE* UNDER 37 C.F.R. § 42.10 and DECLARATION OF RAMSEY AL-SALAM IN SUPPORT (Exhibit 2006)** have been electronically served in its entirety on counsel for Petitioner as follows:

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Dated: May 8, 2024

Respectfully submitted,

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