

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NICHOLSON MANUFACTURING LTD.,

Petitioner,

v.

BID GROUP TECHNOLOGIES LTD.,

Patent Owner.

Case No. PGR2025-00081

Patent No. 12,163,947

MOTION FOR *PRO HAC VICE* ADMISSION
37 C.F.R. § 42.10

This Motion for *Pro Hac Vice* Admission is being filed by Patent Owner Bid Group Technologies Ltd. (“Bid Group”) in the PGR proceeding captioned in the title page of this submission. Bid Group requests the admission of Ms. Caroline E. Burks *pro hac vice* in the PGR proceeding captioned above. Bid Group submits herewith a Declaration of Caroline E. Burks in Support of this Motion for *Pro Hac Vice* Admission. Petitioner does not object to the motion.

Ms. Burks is well-versed in the technical and legal issues raised in the PGR Petition and is especially qualified to serve as backup counsel for Bid Group in this matter. As explained in the attached declaration, Ms. Burks has been practicing in intellectual property litigation groups since October 2021 at McKool Smith, P.C. (Austin, Texas) and Fredrikson & Byron, P.A. (Des Moines, Iowa). Ms. Burks is also particularly well versed in the subject matter and procedural history of the challenged patent, U.S. Patent No. 12,163,947 (the “’947 patent”).

In the course of her representation of Bid Group, Ms. Burks has reviewed and analyzed the ’947 patent and its prosecution history in detail. (*See* Burks Decl. at ¶ 15). She has also reviewed and analyzed the referenced prior art, all of the exhibits to the PGR Petition, and, of course, the Petition itself. (*See id.*) Ms. Burks has a particularly high level of knowledge regarding Bid Group’s prior art contentions raised in this Petition because Ms. Burks has spent significant time with the pleadings in assisting with the drafting of Patent Owner’s Response. (*See id.*)

Pursuant to 37 C.F.R. § 42.10(c), Bid Group further notes that Ms. Burks is a member in good standing of the state bars of Iowa and Texas and is admitted to practice before multiple federal courts. (*See* Burks Decl. ¶ 2.) No court or administrative body has ever (a) suspended or disbarred her from practice; (b) denied her application to practice; or (c) sanctioned her or cited her for contempt. (*See id.* ¶¶ 3-5) Ms. Burks has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials. (*See id.* ¶ 6.) She has also acknowledged that she 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). (*See id.* ¶ 7.)

For the foregoing reasons, Bid Group respectfully requests that this Motion for *Pro Hac Vice* Admission be granted, and that Ms. Caroline E. Burks be admitted to appear *pro hac vice* in the PGR proceeding captioned above.

Respectfully submitted,

/R. Scott Johnson/

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Dated: May 22, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Motion for
*Pro Hac Vice Admission*** was filed via PTAB P-TACTS and served pursuant to 37
C.F.R. § 42.6(e) via electronic mail on May 22, 2026, on the following:

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Declaration of Caroline E. Burks in Support of
Motion for *Pro Hac Vice* Admission

I, Caroline E. Burks, declare as follows:

1. I am a senior associate with Fredrikson & Byron, P.A., and am one of the lawyers representing Patent Owner Bid Group Technologies Ltd. (“Bid Group”) in connection with the PGR Proceeding captioned on the title page of this submission, PGR2025-00081.

2. I am a member in good standing of the following Bars: State of Iowa, State of Texas, U.S. District Court for the Eastern District of Texas, U.S. District Court for the Western District of Texas, U.S. District Court for the Southern District of Texas, U.S. District Court for the Northern District of Texas, U.S. District Court for the Eastern District of Michigan, U.S. District Court for the Southern District of Iowa, U.S. District Court for the Northern District of Iowa.

3. I have never received a suspension or disbarment from practice before any court or administrative body.

4. I have never been denied any application or admission to practice before any court or administrative body.

5. I have never been sanctioned by or received contempt citations from any court or administrative body.

6. I have 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.

7. I 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).

8. Although I am not registered to practice with the USPTO, I have significant research experience with respect to computer science programs and, in particular, cybersecurity risk analysis. I completed a post-graduate cybersecurity fellowship with the Robert S. Strauss Center for International Security and Law, served as the Managing Editor of the Texas Intellectual Property Law Journal, and have been published in three peer-reviewed journals on cybersecurity and intellectual property related issues.

9. Since my graduation from University of Texas School of Law in 2021, I have specialized in intellectual property litigation, and the vast majority of my practice is patent litigation.

10. From August 2021 to October 2025, I practiced within the Intellectual Property Litigation department of McKool Smith, P.C. in the Austin, Texas office. I joined the Intellectual Property Litigation team at Fredrikson & Byron, P.A. in April 2026. (In the intervening time, I took a personal leave for my family and represented pro bono clients on a part-time basis).

11. I have appeared in patent litigation cases across the country, including appearances before the Western and Eastern Districts of Texas, the District of Delaware, the Northern District of California, the Western District of Washington, and before the U.S. International Trade Commission.

12. Through my intellectual property litigation practice, I have experience with a wide range of electrical, mechanical, chemical, and software technologies. Particularly relevant to this PGR, I have significant litigation experience involving the use of machine learning and neural networks.

13. The following is an exemplary – but not exclusive – list of patent cases in which I have made appearances:

Certain Video-Capable Laptop, Desktop Computers, Handheld Computers, Tablets, Televisions, Projectors, and Components and Modules Thereof, Inv. No. 337-TA-1448 (Intl. Trade Comm.);

AlphaSense Oy et al v. Tegus, Inc. et al, Case No. 1-23-cv-01030 (D. Del.);

Akoustis Technologies, Inc. et al v. Qorvo, Inc., Case No. 2-23-cv-00180 (E.D. Tex.);

Carbyne Biometrics, LLC v. Apple Inc., Case No. 1-23-cv-00324 (W.D. Tex.);

Parus Holdings, Inc. v. Amazon.com, Inc., Case No. 1-23-cv-00190 (D. Del.);

Aortic Innovations, LLC v. Edwards Lifesciences Corp. et al, Case No. 1-23-cv-00158 (D. Del.);

Parus Holdings Inc. v. Google, LLC, Case No. 3-22-cv-07830 (N.D. Cal.);

Parus Holdings Inc. v. Apple Inc., Case No. 3-22-cv-07514 (N.D. Cal.);

Parus Holdings Inc. v. Microsoft Corporation, Case No. 2-22-cv-01700 (W.D. Wash.);

24 7.ai, Inc. et al v. Parus Holdings, Inc., Case No.1-22-cv-00159 (D. Del.);

Certain Cellular Base Station Communication Equipment, Components Thereof, and Products Containing Same, Inv. No. 337-TA-1302 (Intl. Trade Comm.);

Certain Mobile Telephones, Tablet Computers with Cellular Connectivity, and Smart Watches with Cellular Connectivity, Components Thereof, and Products Containing Same, Inv. No. 337-TA-1299 (Intl. Trade Comm.);

Certain Mobile Phones, Tablet Computers, Smart Watches, Smart Speakers, and Digital Media Players, and Products Containing Same, Inv. No. 337-TA-1300 (Intl. Trade Comm.);

Certain Mobile Phones and Table Computers, All With Switchable Connectivity, and Products Containing Same, Inv. No. 337-TA-1301 (Intl. Trade Comm.);

Ericsson Inc. et al v. Apple Inc., Case No. 6-22-cv-00060 (W.D. Tex.);

Parus Holdings, Inc. v. Charles Schwab Corporation, Case No. 2-21-cv-00393 (E.D. Tex.);

Parus Holdings Inc. v. Samsung Electronics America, Inc. et al, Case No. 6-21-cv-01073 (W.D. Tex.);

Aortic Innovations LLC v. Edwards Lifesciences Corp. et al, Case No. 1-21-cv-01377 (D. Del.);

Parus Holdings Inc. v. Apple Inc., Case No. 6-21-cv-00968 (W. D. Tex.);

AlphaSense Oy et al v. Sentio, Inc., Case No. 1-21-cv-01011 (D. Del.);

RightQuestion, LLC v. Samsung Electronics Co., Ltd. et al, Case No. 2-21-cv-00238 (E.D. Tex.);

Parus Holdings Inc. v. Microsoft Corporation, Case No. 6-21-cv-00570 (W.D. Tex.); and

Parus Holdings Inc. v. Google, LLC f/k/a Google Inc., Case No. 6-21-cv-00571 (W.D. Tex.).

14. I have assisted in the drafting of preliminary and patent owner responses to *inter partes* review and *ex parte* re-examinations associated with the above matters as well.

15. I am very familiar with the subject matter at issue in this PGR proceeding. I was intimately involved in drafting the Patent Owner Response for the PGR filed in this proceeding. In conjunction with the drafting of the Patent Owner Response, I closely reviewed the subject '947 patent, its prosecution file history, the referenced prior art, all of the exhibits to the PGR Petition, and, of course, the Petition. Further, I have had communications with two of the inventors of the prior art, the inventor of the '947 Patent, the prosecution counsel for the '947 Patent, and the experts retained by the Patent Owner.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my present knowledge and recollection.

Dated: May 22, 2026

/Caroline E. Burks/

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