

Filed on behalf of: LG Electronics, Inc.,
LG Electronics U.S.A., Inc., and
LG Electronics Mobilecomm U.S.A., Inc.

Paper _____

By: Jason Shapiro, Lead Counsel
Soumya P. Panda, Back-up Counsel
ROTHWELL, FIGG, ERNST & MANBECK, P.C.
607 14th Street, N.W., Suite 800
Washington, DC 20005
Phone: 202-783-6040
Facsimile: 202-783-6031
Emails: jshapiro@rothwellfigg.com
spanda@rothwellfigg.com

Filed: March 10, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., AND
LG ELECTRONICS MOBILECOMM U.S.A., INC.,
Petitioner,

v.

CYPRESS SEMICONDUCTOR CORP.,
Patent Owner.

Case IPR2014-01386
Patent 6,012,103

**PETITIONER'S MOTION FOR ADMISSION
PRO HAC VICE OF STEVEN LIEBERMAN**

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10 and the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, mailed September 4, 2014 (Paper 4), Petitioner LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc. (“Petitioner”) requests that the Board admit Steven Lieberman *pro hac vice* in this proceeding to serve as back-up counsel.

II. Statement of Facts Showing There is Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding

In accordance with 37 C.F.R. § 42.10(c), 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. § 42.10(c) indicates that, “where lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize Steven Lieberman *pro hac vice* during this proceeding, so that he may participate in, *inter alia*, oral hearings, depositions, and conferences with the Board.

1. Lead counsel, Jason M. Shapiro, is a registered practitioner.

2. Counsel, Steven Lieberman, is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding. Accompanying this motion is the Declaration of Steven Lieberman in Support of Patent Owner's Motion for Admission *Pro Hac Vice* ("Lieberman Decl."). Mr. Lieberman is a member in good standing of the Bars of the State of New York and the District of Columbia, admitted to practice in the United States District Courts for the District of Columbia, Maryland, the Northern District of California, and the Northern, Eastern, and Southern Districts of New York. Lieberman Decl., ¶ 2. Mr. Lieberman is also admitted to practice in the Courts of Appeals for the District of Columbia, the Second Circuit, the Fourth Circuit, the Federal Circuit, and the United States Supreme Court. *Id.* Mr. Lieberman has served as a President of the Giles S. Rich American Inn of Court, the D.C. Inn is devoted to the practice of intellectual property law. *Id.*, ¶ 3. Mr. Lieberman has been litigating patent cases since 1990, primarily as lead counsel. *Id.*, ¶ 4.

3. Mr. Lieberman is familiar with the subject matter at issue in this proceeding by virtue of his representing the defendants in a lawsuit brought against the Petitioner, *Cypress Semiconductor Corp. v. LG Electronics, Inc. et al.*, Case No. 4:13-cv-04034-SBA (N.D. Cal.) involving the patent at issue in this proceeding. Lieberman Decl., ¶ 11.

4. Mr. Lieberman attests to each of the listed items required by the “Order -- Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639” referenced in the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, mailed September 4, 2014 (Paper 4). See Lieberman Decl., ¶¶ 1-11.

5. Mr. Lieberman has read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R. Lieberman Decl., ¶ 8. Mr. Lieberman agrees to 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) and to be subject to the USPTO Rules of Professional Conduct as set forth in Changes to Representation of Others Before the United States Patent and Trademark Office; Final Rule, 78 Fed. Reg. 20180 (Apr. 3, 2013) (effective May 3, 2013). Lieberman Decl., ¶ 9.

III. Conclusion

The requirements for admission *pro hac vice* being hereby established, Patent Owner Gold Standard Instruments, LLC, respectfully requests that the Board admit Steven Lieberman *pro hac vice* in this proceeding.

Respectfully submitted,

Date: March 10, 2014

By: /Jason M. Shapiro/

Jason M. Shapiro, Reg. No. 35,354

Soumya P. Panda, Reg. No. 60,447

ROTHWELL, FIGG, ERNST &
MANBECK, P.C.

607 14th Street, N.W., Suite 800

Washington, DC 20005

Phone: 202-783-6040

Facsimile: 202-783-6031

Counsel for Petitioner

LG Electronics, Inc.,

LG Electronics, U.S.A., Inc., and

LG Electronics Mobilecomm U.S.A., Inc.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.