

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MERCEDES-BENZ USA, LLC and  
MERCEDES-BENZ U.S. INTERNATIONAL, INC.

*Petitioners,*

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,

*Patent Owner*

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*Inter Partes* Review of U.S. Patent No. 7,300,194

Case No. IPR2015-00360

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**MOTION FOR *PRO HAC VICE* ADMISSION OF  
JONATHAN R. DEFOSSÉ PURSUANT TO 37 C.F.R. § 42.10(c)**

Pursuant to the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (the “Notice”) dated December 30, 2014, Petitioners Mercedes-Benz USA, LLC and Mercedes-Benz U.S. International, Inc. respectfully request the *pro hac vice* admission of Jonathan R. DeFosse as backup counsel for Petitioner in the above-captioned proceeding.

## **1. Time for Filing**

Pursuant to the Notice and the Representative Order in Case IPR2013 00639, Paper 7 (the “Representative Order”), this motion is filed no sooner than twenty-one (21) days after service of the petition. The petition was served on December 4, 2014; thus the earliest permissible filing date for this motion was December 25, 2014.

## **2. Content of Motion**

### **a. Statement of Facts**

Pursuant to the Representative Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. DeFosse *pro hac vice* during the current proceeding.

Mr. DeFosse is a litigation attorney experienced in patent cases, and is admitted to practice law in Virginia and the District of Columbia, as well as before several United States District Courts and Courts of Appeal.

Mr. DeFosse has an established familiarity with the subject matter at issue in this proceeding, as he represents Petitioners as defendants in the related proceeding *Innovative Display Technologies, LLC v. Mercedes-Benz U.S. Int’l, Inc., et al.*, No. 2:14-cv-00535 (E.D. Tex.). In this related proceeding, Patent Owner has asserted against Petitioners the following patents (among others): U.S. Patent No. 7,384,177; U.S. Patent No. 7,300,194; U.S. Patent No. 6,755,547; U.S. Patent No. 7,404,660; U.S. Patent No. 8,215,816; U.S. Patent No. 7,434,974. Mr. DeFosse’s experience representing Petitioner in this related proceeding, concerning the same patents against the same Patent Owner, provides him with an established familiarity with the subject matter at issue in the current proceeding.

Petitioners therefore respectfully submit that there is good cause for the Board to recognize Mr. DeFosse *pro hac vice* during the current proceedings.

### **3. Declaration**

Pursuant to the Representative Order, a declaration of Jonathan R. DeFosse is submitted as Exhibit 1025 to this motion.

Dated: March 6, 2015

*/s/ Scott W. Doyle*  
Scott W. Doyle (Reg. No. 39176)  
Lead Counsel for Petitioners  
SHEARMAN & STERLING LLP  
801 Pennsylvania Ave. NW, Ste. 900  
Washington, DC 20004  
Telephone (202) 508-8000  
Facsimile: (202) 508-8100  
[Scott.Doyle@shearman.com](mailto:Scott.Doyle@shearman.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 6, 2015, the foregoing  
**MOTION FOR PRO HAC VICE ADMISSION OF JONATHAN R.  
DEFOSSE**, along with the associated Exhibit 1025 and Petitioner's Exhibit List,  
were served via electronic mail upon counsel for the Patent Owner:

Justin B. Kimble  
Jeffrey R. Bragalone  
Bragalone Conroy PC  
2200 Ross Avenue  
Suite 4500 – West  
Dallas, TX 75201  
jkimble@bcpc-law.com  
jbragalone@bcpc-law.com

Dated March 6, 2015

*/s/ Scott W. Doyle*  
Scott W. Doyle (Reg. No. 39176)  
Lead Counsel for Petitioners  
SHEARMAN & STERLING LLP  
801 Pennsylvania Ave., NW,  
Ste. 900  
Washington, DC 20004  
Telephone: (202) 508-8000  
Facsimile: (202) 508-8100  
scott.doyle@shearman.com