

Filed on behalf of Delaware Display Group LLC  
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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG DISPLAY CO., LTD.,  
Petitioner,  
v.

DELAWARE DISPLAY GROUP LLC,  
Patent Owner.

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Case IPR2015-00506  
U.S. Patent No. 7,434,973

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***PRO HAC VICE* MOTION TO ADMIT ATTORNEY JEFFREY R.  
BRAGALONE PURSUANT TO 37 C.F.R. § 42.10(c)**

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P.O. Box 1450

Patent Owner Delaware Display Group LLC (“DDG”) hereby files this motion pursuant to 37 C.F.R. § 42.10(c) for Jeffrey R. Bragalone to appear *pro hac vice* on its behalf before the Patent Trial and Appeal Board in IPR2015-00506. This motion follows the guidelines set forth in IPR2013-00639, Paper 7, entered October 15, 2013.

**A. Lead Counsel is a Registered Practitioner.**

DDG has already designated a registered practitioner, Justin B. Kimble (reg. no. 58,591) as lead counsel. DDG intends to designate Jeffrey R. Bragalone as its back-up counsel in the event this motion is granted.

**B. There is Good Cause for the Board to Recognize Jeffrey R. Bragalone *pro hac vice* during this proceeding.**

**1. Mr. Bragalone is an experienced litigator.**

Jeffrey R. Bragalone is an experienced litigator with over 26 years of experience. He has argued three patent cases before the Federal Circuit: (1) *Greenliant Sys., Inc. v. Xicor LLC*, 692 F.3d 1261 (Fed. Cir. 2012); (2) *United Access Technologies, LLC v. Earthlink, Inc.*, 432 F. App’x 976 (Fed. Cir. 2011); (3) *Board of Regents of the University of Texas System v. BenQ America Corp.*, 533 F.3d 1362 (Fed. Cir. 2008); and appeared on brief in a fourth case: (4) *Tegic Commc’ns Corp. v. Board of Regents of the University of Texas System*, 458 F.3d 1335 (Fed. Cir. 2006). In addition to his argument before the Federal Circuit, Mr. Bragalone has

represented numerous clients in patent litigation and general litigation as lead counsel in district courts and state courts across the United States. Mr. Bragalone also currently represents plaintiffs in the patent litigation styled *HSM Portfolio LLC et al. v. Fujitsu Ltd. et*, No. 1:11-cv-00770 (D. Del., filed September 1, 2011). Mr. Bragalone has also participated in several oral arguments before the PTAB, including in IPR2014-00785 and IPR2014-00824.

**2. Mr. Bragalone has an established familiarity with the subject matter at issue in the proceeding.**

Mr. Bragalone currently represents DDG in its assertion of U.S. Patent No. 7,434,973 and its related patents in numerous cases resolved in the Eastern District of Texas and pending in the District of Delaware. *See, e.g., Delaware Display Group LLC et al. v. LG Electronics, Inc. et al.*, No. 1:13-cv-02109 (D. Del., filed Dec. 31, 2013); *see also Delaware Display Group LLC et al. v. Vizio Inc., et al.*, No. 1:13-cv-02112 (D. Del., filed Dec. 31, 2013). As lead counsel in those actions, Mr. Bragalone has familiarized himself with the subject matter at issue in this proceeding, *i.e.*, light emitting panel assemblies and light redirecting film systems having pattern of variable optical elements. During the course of those lawsuits, Mr. Bragalone has developed invalidity defenses for the patent-at-issue in this petition as well as its related patents. Furthermore, in those lawsuits Mr. Bragalone has developed infringement allegations that assert the patent-at-issue in this petition

against various devices, including those found in smart phones, tablets, laptop computers, and televisions to name a few. In his role as the lead counsel in those litigations, Mr. Bragalone has spent significant time learning the technology involved in light redirecting film systems having pattern of variable optical elements such as those found in the patent-at-issue in this proceeding.

**C. Mr. Bragalone has Submitted Herewith a Declaration<sup>1</sup> Attesting the Following Facts.**

1. Mr. Bragalone is a member in good standing of the Texas State Bar.
2. Mr. Bragalone has never been subject to any suspensions or disbarments from practice before any court or administrative body.
3. None of Mr. Bragalone's applications for admission to practice before any court or administrative body has ever been denied.
4. Mr. Bragalone has never been sanctioned nor had contempt citations imposed by any court or administrative body.
5. Mr. Bragalone 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 42 of 37 C.F.R.

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<sup>1</sup> See Declaration of Jeffrey R. Bragalone, attached hereto as Exhibit 2001.

6. Mr. Bragalone 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).
7. During the past three years, Mr. Bragalone has applied to appear *pro hac vice* before the PTAB in twenty-one other proceedings, nineteen of which have been granted and the rest remain pending. Ten of the *pro hac vice* motions involve the same or related parties as this proceeding and also involve the same or similar subject matter:
  - i. IPR2014-01092 (*granted*);
  - ii. IPR2014-01094 (*granted*);
  - iii. IPR2014-01095 (*granted*);
  - iv. IPR2014-00096 (*granted*);
  - v. IPR2014-01097 (*granted*);
  - vi. IPR2014-01357 (*granted*);
  - vii. IPR2014-01359 (*granted*);
  - viii. IPR2014-01362 (*granted*);
  - ix. IPR2015-00487 (*pending*); and
  - x. IPR2015-01717 (*pending*).

The remaining eleven *pro hac vice* motions involve eleven other IPRs all unrelated to this petition:

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