

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC AMERICA INC., HTC CORP., LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC.,
LG ELECTRONICS MOBILECOMM U.S.A., INC.,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC
Patent Owner.

Case IPR2015-01501
Patent 7,777,753

Mailed: July 8, 2015

Before KAREN HILASKI, *Trial Paralegal*.

**PARTHENON UNIFIED MEMORY ARCHITECTURE LLC's
UNOPPOSED MOTION FOR PRO HAC VICE 37 C.F.R. 42.10**

The Patent Owner respectfully requests that the Board recognize Mr. Alavi
Alavi as counsel *pro hac vice* during this proceeding.

1. Time for Filing

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty one (21) days after service of the petition.

2. Statement of Facts

The following statement of facts shows that there is good cause for the Board to recognize Mr. Alavi as counsel for Patent Owner *pro hac vice*.

Mr. Alavi is an experienced litigation attorney, and has been involved in a significant number of District Court litigations involving patent infringement, including jury trials and *Markman* hearings. Mr. Alavi's biography is attached hereto as Exhibit A.

U.S. Patent No. 7,777,753 ("the '753 Patent") is currently asserted against Petitioners HTC Corporation, HTC America, Inc., LG Electronics, Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. in co-pending litigations in the U.S. District Court for the Eastern District of Texas: *Parthenon Unified Memory Architecture LLC v. Huawei Techs. Co., Ltd. et al.*, No. 2:14-cv-00687-JRG-RSP (E.D. Tex.) filed June 12, 2014; *Parthenon Unified Memory Architecture LLC v. Motorola Mobility, Inc.*, No. 2:14-cv-00689-JRG-RSP (E.D. Tex.) filed June 12, 2014; *Parthenon Unified Memory Architecture LLC v. HTC Corp. et al.*, No. 2:14-cv-00690-RSP (E.D. Tex.) filed June 12, 2014; *Parthenon Unified Memory Architecture LLC v. LG Elecs., Inc. et al.*, No. 2:14-cv-00691-

JRG-RSP (E.D. Tex.) filed June 12, 2014; *Parthenon Unified Memory Architecture LLC v. Samsung Elecs. Co., Ltd. et al.*, No. 2:14-cv-00902-JRG-RSP (E.D. Tex.) filed September 22, 2014; *Parthenon Unified Memory Architecture LLC v. Qualcomm Inc. et al.*, No. 2:14-cv-00930-JRG-RSP (E.D. Tex.) filed October 1, 2014; *Parthenon Unified Memory Architecture LLC v. ZTE Corp. et al.*, No. 2:15-cv-00225-JRG-RSP (E.D. Tex.) filed February 17, 2015; *Parthenon Unified Memory Architecture LLC v. Apple, Inc.*, No. 2:15-cv-00621-JRG-RSP (E.D. Tex.) filed May 1, 2015; and *Parthenon Unified Memory Architecture LLC v. LG Electronics Mobilcomm USA, Inc.*, No. 2:15-cv-1950 (E.D. Tex.) filed November 30, 2015. Mr. Alavi is lead counsel for Parthenon Unified Memory Architecture, LLC in the co-pending litigation and, as such, has an established familiarity with the subject matter at issue in this proceeding. In the co-pending litigation Mr. Alavi argued the *Markman* hearings, reviewed prior art references and claim charts for invalidity contentions, and was heavily involved in forming claim construction positions and drafting claim construction briefs, all of which are relied upon in the petition requesting inter parties review of U.S. Patent No. 7,777,753. Patent Owner has expended significant financial resources in the co-pending litigations with Mr. Alavi as counsel, and Patent Owner wishes to continue using Mr. Alavi as counsel in this proceeding.

Further, counsel for Petitioners does not oppose Mr. Alavi appearing *pro hac vice* this proceeding.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Alavi as counsel *pro hac vice* during this proceeding.

3. Affidavit or Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by Affidavit of Mr. Amir Alavi.

Dated: March 4, 2016

Respectfully Submitted,

By: /s/ Masood Anjom
Masood Anjom
Reg. No. 62,167
Attorney for Patent Owner
Parthenon Unified Memory
Architecture, LLC

**AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING, P.C.**
1221 McKinney Street, Suite 2500
Houston, TX 77010
Telephone: 713-655-1101

CERTIFICATE OF SERVICE

I hereby certify that Parthenon Unified Memory Architecture LLC's Motion for *Pro Hac Vice* Admission Under 37 C.F.R. 42.10 were served on March 4, 2016, by electronic mail to the following:

Back-up Counsel for LG Electronics, Inc.	Back-up Counsel for LG Electronics, Inc.
Rajeev Gupta Reg. No. 55,873 Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. 901 New York Avenue, N.W. Washington, D.C. 20001-4413 Tel: (202) 408-4000 Fax: (202) 408-4400 Email: LGE_Finnegan_PUMAIPR@finnegan.com	Darren M. Jiron Reg. No. 45,777 Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. 11955 Freedom Drive Reston, VA 20190-5675 Tel: (571) 203-2700 Fax: (202) 408-4400 Email: LGE_Finnegan_PUMAIPR@finnegan.com
Back-up Counsel for HTC Corporation	Back-up Counsel for HTC Corporation
Joseph A. Micallef Reg. No. 39,772 Sidley Austin LLP 1501 K Street, N.W. Washington, DC 20005 Tel: (202) 736-8492 Email: jmicallef@sidley.com	Stephen M. Everett Reg. No. 30,050 Sidley Austin LLP 555 California Street, Suite 2000 San Francisco, CA 94104 Tel: (415) 772-7482 Email: Stephen.everett@sidley.com
Lead Counsel for Samsung Electronics	Back-up Counsel for Samsung Electronics
Allan M. Soobert Reg. No. 36,284 Paul Hastings LLP 875 15 th Street NW Washington, DC 20005 Tel: (202) 551-1990 Fax: (202)551-0490 Email: Samsung-PUMA-IPR@paulhastings.com	Naveen Modi Reg. No. 46,224 Paul Hastings LLP 875 15 th Street NW Washington, DC 20005 Tel: (202) 551-1990 Fax: (202)551-0490 Email: Samsung-PUMA-IPR@paulhastings.com

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