

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION, HTC AMERICA, INC.,
LG ELECTRONICS, INC., SAMSUNG ELECTRONICS CO., LTD.,
and SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,
Patent Owner.

Case IPR2015-01502
Patent 7,542,045

Mailed: July 8, 2015

Before Carla D. Chrisp, *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. Justin Chen 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. Chen as counsel for Patent Owner *pro hac vice*.

Mr. Chen is an experienced litigation attorney, and has been involved in numerous litigations involving patent infringement in District Courts across the country. He has experience in Markman hearings in patent infringement matters. Mr. Chen's biography is attached hereto as Exhibit 2011.

U.S. Patent No. 7,752,045 ("the '045 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. Chen is 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. Chen 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. 7,542,045. Patent Owner has expended significant financial resources in the co-pending litigations with Mr. Chen as counsel, and Patent Owner wishes to continue using Mr. Chen as counsel in this proceeding.

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

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Chen 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. Justin Chen.

Dated: August 11, 2016

Respectfully Submitted,

By: /s/ Masood Anjom
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Parthenon Unified Memory
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CERTIFICATE OF SERVICE

I hereby certify that Parthenon Unified Memory Architecture LLC's Unopposed Motion for *Pro Hac Vice* Admission Under 37 C.F.R. 42.10 were served on August 11, 2016, by electronic mail to the following:

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