

By: Christopher Frerking (chris@ntknet.com)
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORP.,

Petitioner,

v.

DANIEL L. FLAMM,

Patent Owner.

CASE IPR2015-01764
U.S. Patent No. RE40,264 E

PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF GEORGE C. SUMMERFIELD

Mail Stop: PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10 and with the Board's authorization (Paper 3, dated August 27, 2015), Patent Owner Daniel L. Flamm (Flamm), by its attorney, respectfully requests admission of George C. Summerfield *pro hac vice* in this proceeding.

II. Statement of Facts Showing 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, subject to the conditions set forth therein, and any others that the Board may impose. Petitioners set forth these facts in support of this motion:

1. Lead counsel for Petitioners in this proceeding, Christopher Frerking, is a registered practitioner (Registration No. 42557).
2. Mr. Summerfield is an experienced litigator and has established familiarity with the subject matter of this proceeding. Accompanying this motion as Ex. 2008, the Declaration of George C. Summerfield in Support of this Motion for Admission Pro Hac Vice ("Summerfield Dec." Ex. 2008 ¶ 1.)
3. Mr. Summerfield is a member in good standing of the Bar of Michigan. (Id. ¶ 2.)
4. Mr. Summerfield has had no suspensions or disbarments from practice before any court or administrative body. (Id. ¶ 3.) In addition, no application for

admission to practice before any court or administrative body ever denied and no sanctions or contempt citations have been imposed on Mr. Summerfield by any court or administrative body. (Id.)

5. Mr. Summerfield 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. (Id. ¶ 4.)
6. Mr. Summerfield agrees to be subject to the United States Patent and Trademark Office Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 *et seq.*, and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). (Id. ¶ 5.)
7. Mr. Summerfield has familiarity with the subject matter at issue in the proceeding. (Id. ¶ 7.) He has reviewed the patent-at-issue as well as the prior art in the instant proceeding. (Id. ¶ 8.)

III. No Opposition to this Motion

Patent Owner has confirmed with Petitioner that Petitioner does not oppose the present motion.

IV. Conclusion

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Mr. Summerfield *pro hac vice* in this proceeding.

Respectfully Submitted:

Date: July 19, 2016

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CERTIFICATE OF SERVICE: Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on July 19, 2016, a complete and entire copy of the forgoing, was provided by email to Petitioner's counsel, Michael Fleming, Samuel K. Lu and Kamran Vakili, IRELL & MANELLA LLP, 1800 Avenue of the Stars, Suite 900, Los Angeles, California 90067, *via email*, pursuant to 37 C.F.R. § 42.105, by serving the email addresses of record as follows: mflaming@irell.com; slu@irell.com; kvakili@irell.com.

By: /s/ Beata Ichou
Beata Ichou