

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In re Application of: Marthieu Kennedy
Martyn

Case No.: IPR2015-01984

Filed: August 27, 2003

Issued: April 30, 2013

Assignee: Core Wireless Licensing
S.a.r.l.

Title: COMPUTING DEVICE WITH
IMPROVED USER INTERFACE FOR
APPLICATIONS

**In Support of the Petition for *Inter
Partes* Review of U.S. Patent No.
8,434,020**

**LG ELECTRONICS, INC.'S UNOPPOSED MOTION
FOR *PRO HAC VICE* ADMISSION OF NICHOLAS A. BROWN UNDER 37
C.F.R. § 42.10(c)**

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United States Patent and Trademark Office
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Certificate of Filing: I hereby certify that this Motion is being electronically filed with the USPTO on this 25th day of April, 2016.

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Petitioner LG Electronics, Inc. (“LG”), by and through its attorneys, respectfully requests that the Board admit Nicholas A. Brown *pro hac vice* in this proceeding.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c) states as follows:

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

Further, the Board requires that a motion for *pro hac vice* admission be filed in accordance with the “ORDER-AUTHORIZING MOTION FOR PRO HAC VICE ADMISSION – 37 C.F.R. §42.10” in Motorola Mobility LLC v. Patent of Michael Arouse, Case No. IPR2013-00010 (“Representative Order”). The Representative Order states that the motion must “[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding,” and “[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:”

- i. Membership in good standing of the Bar of at least one State or the District of Columbia;

- ii. No suspensions or disbarments from practice before any court or administrative body;
- iii. No application for admission to practice before any court or administrative body ever denied;
- iv. No sanctions or contempt citations imposed by any court or administrative body;
- v. The individual seeking to appear 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 the C.F.R.;
- vi. The individual will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 *et seq.*¹ and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);
- vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

¹ The USPTO Code of Professional Responsibility in 37 C.F.R. § 10.20 *et seq.* was replaced by the USPTO Rules of Professional Conduct in 37 C.F.R. § 11.101 *et seq.*, effective May 3, 2013.

- viii. Familiarity with the subject matter at issue in the proceeding.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Nicholas A. Brown submitted herewith as Exhibit 1007, LG submits that a showing of good cause has been made and respectfully requests the *pro hac vice* admission of Nicholas A. Brown in this proceeding:

1. LG's lead counsel, Herbert Finn, is a registered practitioner (Reg. No. 38,139).
2. LG's backup counsel, Richard D. Harris, Reg. No. 27,898, Eric J. Maiers, Reg. No. 59,614, and Askhon Cyrus, Reg. No. 69,832 are registered practitioners.
3. Mr. Brown is a Shareholder at the law firm of Greenberg Traurig, LLP ("Greenberg"). Mr. Brown joined Greenberg as a Shareholder in October 2010. (Declaration of Nicholas A. Brown in Support of LG's Unopposed Motion for *pro hac vice* Admission of Nicholas A. Brown under 37 C.F.R. § 42.10(c).)
4. Mr. Brown is an experienced litigating attorney and has specific experience in patent law and patent law litigation. Mr. Brown has represented clients in numerous patent infringement actions across the

country. Mr. Brown has litigated matters through trial and appeal.

(Id.)

5. Mr. Brown is a member in good standing of the California State Bar.
(Id.)
6. Mr. Brown has never been suspended or disbarred from practice before any court or administrative body. *(Id.)*
7. No application filed by Mr. Brown for admission to practice before any court or administrative body has ever been denied. *(Id.)*
8. No sanctions or contempt citations have been imposed against Mr. Brown by any court or administrative body. *(Id.)*
9. Mr. Brown has read and agrees to comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R. *(Id.)*
10. Mr. Brown understands that he will be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. §11.19(a). *(Id.)*
11. Mr. Brown is currently or soon will be seeking *pro hac vice* admission in the following matters filed by LG: IPR Nos. 2015-01983, 2015-01984, and 2015-01985. In the past three years, Mr. Brown has applied to appear *pro hac vice* in one other proceeding before the

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