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Filed on behalf of Intel Corporation  
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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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INTEL CORPORATION  
Petitioner

v.

DSS Technology Management, Inc.  
Patent Owner

Case IPR2016-00290

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF  
LOUIS W. TOMPROS**

**I. Statement of Precise Relief Requested**

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 14 authorizing Petitioner to perfect its motion for *pro hac vice* admission of Louis W. Tompros under 37 C.F.R. § 42.10(c), Petitioner requests that the Patent Trial and Appeal Board (the “Board”) admit Louis W. Tompros *pro hac vice* in this proceeding, IPR2016-00290.

In his declaration dated March 24, 2016 (Ex. 1120), Mr. Tompros inadvertently omitted averments required by the '639 Order, part 2(b), paragraphs ii and iv. Mr. Tompros' updated declaration corrects this inadvertent omission and specifically avers that Mr. Tompros was never suspended, or disbarred from practice before any court or administrative body and that a sanction or contempt citation was never imposed on him by any court or administrative body.

**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 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. Section 42.10(c) indicates that “where 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 a showing that counsel is an

experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize Louis W. Tompros *pro hac vice* in this proceeding.

1. Lead counsel, Grant Rowan, is a registered practitioner. Backup counsel, Yung-Hoon Ha, is also a registered practitioner.

2. Counsel, Louis W. Tompros, is an experienced litigator and has an established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion as Exhibit 1122 is the August 10, 2016 Updated Declaration of Louis W. Tompros in Support of this Motion for Admission *Pro Hac Vice* (“Tompros Decl.”). In his declaration, Mr. Tompros asserts:

I am a member in good standing of the Bar of the Commonwealth of Massachusetts, and am admitted to practice before the United States Court of Appeals for the Federal Circuit, the United States Supreme Court, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Seventh Circuit, and the United States District Court for the District of Massachusetts.

Tompros Decl. ¶ 3 (Ex. 1122). Mr. Tompros also asserts:

I am familiar with the subject matter at issue in this proceeding. I participated in the drafting of the Petition filed in this proceeding, and I have reviewed the papers filed in this proceeding. I have represented Intel Corporation in multiple patent-related matters, including the following United States District Court cases: *DSS Tech.*

*Mgmt., Inc. v. Intel Corp. et al.*, 6:15-CV-130-JRG (E.D. Tex.), which is related to and involves the same patent at issue in this proceeding; *Power Management Solutions LLC v. Intel Corporation et al*, 1:11-cv-00743 (D. Del.); and *Power Management Solutions LLC v. Intel Corporation*, 13-1457 (Fed. Cir.).

Tompros Decl. ¶¶ 13-14 (Ex. 1122).

3. In his declaration, Mr. Tompros also attests to each of the listed items required by the “Order – Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639, Paper 7. *See* Tompros Decl. ¶¶ 1-15 (Ex. 1122). Specifically, Mr. Tompros avers:

I have never been suspended, disbarred, sanctioned or cited for contempt by any court or administrative body.

Tompros Decl. ¶ 8 (Ex. 1122).

### III. Conclusion

For the foregoing reasons, Petitioners respectfully request that the Board admit Louis W. Tompros *pro hac vice* in this proceeding.

Respectfully Submitted,

/Grant K. Rowan/

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Grant K. Rowan, Reg. No. 41,278  
Yung-Hoon Ha, Reg. No. 56,368  
Wilmer Cutler Pickering Hale & Dorr  
LLP

Dated: August 10, 2016

**List of Exhibits for Petition for *Inter Partes* Review of U.S. Patent No. 5,965,924**

<b>Exhibit</b>	<b>Description</b>
1101	U.S. Patent No. 5,965,924
1102	Bravman Declaration
1103	U.S. Patent No. 5,475,240 (“Sakamoto”)
1104	U.S. Patent No. 5,100,817 (“Cederbaum”)
1105	Continued Prosecution Application Request dated February 10, 1999
1106	Amendment and Rule 131 Declaration dated January 5, 1998
1107	Office Action dated November 7, 1996
1108	U.S. Patent No. 5,541,434 (“Nicholls”)
1109	Amendment dated June 9, 1997
1110	Office Action dated February 24, 1998
1111	U.S. Patent No. 5,541,427 (“Chappell”)
1112	Amendment dated April 23, 1998
1113	U.S. Patent No. 5,453,640 (“Kinoshita”)
1114	Amendment dated August 14, 1996
1115	C. Fred Hiatt, Jeffery W. Butterbaugh and David C. Gray, <i>UV-Enhanced Etching of Silicon Oxide by Chlorine Trifluoride</i> , in PROCEEDINGS OF THE SECOND INTERNATIONAL SYMPOSIUM ON ULTRA-CLEAN PROCESSING OF SILICON SURFACES (Marc Heyns ed. 1994) (“Hiatt”).
1116	J. Seto, “The electrical properties of polycrystalline silicon films,” <i>Journal of Applied Physics</i> , 46 (1975) (“Seto”)

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