

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION AND MICROSOFT MOBILE INC.,

Petitioner,

v.

KONINKLIJKE PHILIPS N.V.,

Patent Owner.

Case IPR2017-01766
Patent No. RE44,913

**PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION
UNDER 37 C.F.R. § 42.10(c)**

Petitioners Microsoft Corporation and Microsoft Mobile Inc. (collectively “Petitioner”) respectfully request that the Board admit Chad S. Campbell as backup counsel *pro hac vice* in this proceeding. Mr. Campbell is an experienced litigation attorney and has substantial knowledge in the substantive issues of the invalidity of the challenged claims of the Patent in this proceeding. Therefore, Mr. Campbell meets the requirements of “an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding” under 37 C.F.R. §42.10(c).

1. Time For Filing

This Motion for *Pro Hac Vice* Admission has been authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on July 21, 2017 (Paper 4). This Motion is filed no sooner than twenty one (21) days after service of the petition.

2. Statement of Facts

In this proceeding, lead counsel for Petitioner is Christina McCullough, a registered practitioner. The following statement of facts shows that there is good cause for the Board to admit Mr. Campbell *pro hac vice*.

Mr. Campbell is a patent litigation attorney with more than 23 years of experience representing clients in cases involving semiconductor technology,

computer design and software. (Affidavit of Chad S. Campbell (“Campbell Affidavit”), ¶ 8 in attached Exhibit 1029.)

Mr. Campbell regularly litigates patent cases in various forums including the United States Court of Appeals for the Federal Circuit and various federal district courts. (*Id.*) He has experience representing clients in many phases of litigation including discovery, Markman hearings, jury trials, and appeals. (*Id.*)

Mr. Campbell has an established familiarity with the subject matter at issue in this proceeding, having represented Petitioner in a court proceeding against Patent Owner involving the same technology (*Koninklijke Philips N.V. et al. v. Acer Inc. et al.*, Case No. 1:15-cv-01170-GMS (D. Del.); *Koninklijke Philips N.V. et al. v. Asustek Computer Inc. et al.*, Case No. 1:15-cv-01125-GMS (D. Del.); *Koninklijke Philips N.V. et al. v. Double Power Technology, Inc. et al.*, Case No. 1:15-cv-01130-GMS (D. Del.); *Koninklijke Philips N.V. et al. v. Visual Land, Inc.*, Case No. 1:15-cv-01127-gms (D. Del.); *Koninklijke Philips N.V. et al. v. Yifang USA, Inc.*, Case No. 1:15-cv-01131-GMS (D. Del.)).

Mr. Campbell is familiar with the technologies and issued claims in the 6,522,695, 7,529,806 and RE44,913 Patents. Mr. Campbell is also familiar with the prior art references cited in PTAB Case Nos. IPR2017-00890, IPR2017-01754 and IPR2017-01766 and the associated invalidity grounds before the PTAB.

3. Affidavit or Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Mr. Campbell (Exhibit 1029), which attests to the requirements for *pro hac vice* admission set forth in IPR2013-00639, Paper 7, dated Oct. 15, 2013.

4. Conclusion

Accordingly, Petitioners submit that there is good cause under 37 C.F.R. § 42.10(c) for the Board to admit Chad S. Campbell as counsel *pro hac vice* and to authorize Mr. Campbell to represent Petitioner as back-up counsel in this proceeding.

Dated: September 7, 2017

Respectfully submitted,

/Christina McCullough/

Lead Counsel

Christina J. McCullough, Reg. No. 58,720

Back-Up Counsel

Chad S. Campbell, *Pro Hac Vice*

Attorneys for Microsoft Corporation and
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing
PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37
C.F.R. § 42.10(c) and Exhibit 1029 were served in its entirety this 7th day of
September, 2017 by electronic mail on the Patent Owner via its attorneys of
record:

Justin J. Oliver, Reg. No. 44,986
Jason Dorsky, Reg. No. 64,710
PhilipsIPR@fchs.com

Dated: September 7, 2017

Respectfully submitted,

/Christina McCullough/

Lead Counsel

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Back-Up Counsel

Chad S. Campbell, *Pro Hac Vice*

Attorneys for Microsoft Corporation and
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