

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING CO., LTD,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2017-01843¹
Patent 7,893,501

**MOTION FOR *PRO HAC VICE* ADMISSION OF
JOSHUA J. MILLER**

¹ Case IPR2017-01844 has been consolidated with this proceeding.

APPENDIX LISTING OF EXHIBITS

Exhibit	Description
2201	Request for Continued Examination dated March 29, 2010
2202	U.S. Patent No. 6,437,404 (“Xiang”)
2203	U.S. Patent No. 6,870,230 (“Matsuda”)
2204	Office Action dated March 29, 2010
2205	U.S. Patent No. 3,390,022
2206	McGraw-Hill Dictionary of Scientific and Technical Terms (2003)
2207	Declaration of Joshua J. Miller in Support of Motion for Admission <i>Pro Hac Vice</i>

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3, Godo Kaisha IP Bridge 1 (“Patent Owner”) respectfully requests that the Patent Trial and Appeal Board admit Joshua J. Miller *pro hac vice* in this proceeding, IPR2017-01843. Patent Owner is concurrently seeking admission of Mr. Miller *pro hac vice* in related case IPR2017-01841.

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 that 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 Mr. Miller *pro hac vice* in this proceeding.

First, as set forth in Mr. Miller's declaration (Ex. 2207) at paragraphs H through J, Mr. Miller has familiarity with the subject matter at issue in these proceedings. He has worked on preparing and reviewing the materials submitted in this proceeding.

Second, Mr. Miller has extensive patent litigation experience and is expected to use his experience to support Lead Counsel during the proceedings, including during depositions. Good cause exists to have Patent Owner appoint as counsel Mr. Miller, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Miller attests to all of the remaining matters set forth in Paper No. 7 from *Unified Patents v. Parallel Iron*, Case IPR2013-00639 (PTAB Oct. 15, 2013).

III. CONCLUSION

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

Dated: March 14, 2018

Respectfully submitted,
Godo Kaisha IP Bridge I

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on March 14, 2018, I will cause a copy of the foregoing document, including any exhibits referred to therein, to be served via electronic mail, as previously consented to by Petitioner, upon the following:

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Date: March 14, 2018

/MacAulay Rush /
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