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Filed on behalf of Intel Corporation

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Corporation
Petitioner

v.

Qualcomm Incorporated
Patent Owner

Case IPR2018-01240
U.S. Patent No. 8,698,558

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

I. Statement of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 7 authorizing the parties to file motions for *pro hac vice* admissions under 37 C.F.R. § 42.10(c), Petitioner Intel Corp. (“Petitioner”) requests that the Patent Trial and Appeal Board (the “Board”) admit Louis Tompros *pro hac vice* in this proceeding, IPR2018-01240.

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 Tompros *pro hac vice* in this proceeding.

1. Lead counsel, David L. Cavanaugh, is a registered practitioner. Backup counsel, Richard Goldenberg, is also a registered practitioner.
2. Counsel, Louis Tompros, is an experienced litigator and has established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion as Exhibit 1327 is the February 15, 2019, Declaration of Louis 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 Supreme Court, the Massachusetts Supreme Judicial Court, the United States Courts of Appeal for the First, Seventh, Ninth, and Federal Circuits, and the United States District Courts for the District of Massachusetts and the Eastern District of Michigan.

Tompros Decl. ¶ 3 (Ex. 1327). 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 am representing and have represented Apple Inc. (“Apple”), which Petitioner Intel has identified as a real party-in-interest, in *Certain Mobile Electronic Devices and Radio Frequency and Processing Components Thereof*, Investigation No. 337-ITC-1065 (the “Apple ITC litigation”, which is a related matter to this proceeding) and in *Qualcomm Inc. v. Apple Inc.*, No. 3:17-cv-1375 (S.D. Cal.) (the “Apple litigation”, which is a related matter to this proceeding). In addition, I am representing and have

Petitioner's Motion for Admission *Pro Hac Vice* of Louis Tompros

represented Petitioner Intel Corporation in multiple patent-related matters, including the following United States District Court cases: *VLSI Tech. LLC v. Intel Corp.*, No. 5:17-cv-05671 (N.D. Cal.); *VLSI Tech. LLC v. Intel Corp.*, No. 1:18-cv-00966 (D. Del.); *DSS Technology Management, Inc. v. Intel Corp.*, Nos. 6:15-cv-00130 and 6:14-cv-00197 (E.D. Tex.); and *Power Management Solutions v. Intel Corp.*, No. 1:11-cv-00743 (D. Del.).

Tompros Decl. ¶¶ 14-15 (Ex. 1327).

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. 1327).

III. Conclusion

For the foregoing reasons, Petitioner respectfully requests that the Board admit Louis Tompros *pro hac vice* in this proceeding.

Respectfully Submitted,

/Theodoros Konstantakopoulos/

Theodoros Konstantakopoulos
Reg. No. 74,155
Wilmer Cutler Pickering Hale & Dorr LLP

Dated: February 15, 2019

Table of Exhibits for U.S. Patent 8,698,558 Petition for *Inter Partes* Review

Exhibit	Description
1301	U.S. Patent No. 8,698,558
1302	File History for U.S. Patent No. 8,698,558
1303	Declaration of Dr. Alyssa B. Apsel
1304	Chu, W.Y. et al., " <i>A 10 MHz Bandwidth, 2 mV Ripple PA Regulator for CDMA Transmitters</i> ," IEEE Journal of Solid-State Circuits 2809-2819 (2008) ("Chu")
1305	Declaration of IEEE regarding Chu, Kwak, Kim, and Blanken ("IEEE Chu Decl.")
1306	Choi, J. et al., " <i>Envelope Tracking Power Amplifier Robust to Battery Depletion</i> ," Microwave Symposium Digest (MTT), 2010 IEEE MTT-S International 1332-36 (2010) ("Choi 2010")
1307	Declaration of IEEE regarding Choi 2010 ("IEEE Choi Decl.")
1308	Declaration of Debabani Choudhury ("Choudhury Decl.")
1309	Declaration of Jinsung Choi ("Choi Decl.")
1310	Blanken, P.G. et al., " <i>A 50MHz Bandwidth Multi-Mode PA Supply Modulator for GSM, EDGE and UMTS Application</i> ," 2008 Radio Frequency Integrated Circuits Symposium (IEEE) 401-04 (2008) ("Blanken")
1311	Kwak, T.W. et al., " <i>A 2 W CMOS Hybrid Switching Amplitude Modulator for EDGE Polar Transmitters</i> ," IEEE Journal of Solid-State Circuits 2666-76 (2007) ("Kwak")
1312	U.S. Patent No. 5,929,702, "Method and Apparatus for High Efficiency High Dynamic Range Power Amplification," to Myers et al. ("Myers")
1313	Kim, D. et al., " <i>High Efficiency and Wideband Envelope Tracking Power Amplifier with Sweet Spot Tracking</i> ," Radio Frequency Integrated Circuits Symposium (RFIC): 255-258 (2010) ("Kim")

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