UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.; AND SAMSUNG ELECTRONICS AMERICA, INC., Petitioners,

V.

NEODRON LTD., Patent Owner.

Case No. IPR2020-00267 U.S. Patent No. 8,432,173

PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION

Patent Owner, Neodron Ltd., hereby requests the Board recognize Christian W. Conkle as counsel *pro hac vice* for this proceeding under 37 C.F.R. § 42.10(c). Petitioner does not oppose this motion.

I. STATEMENT OF FACTS

As required by § 42.10(c), the following statement of facts demonstrates that there is good cause for the Board to recognize Mr. Conkle *pro hac vice*.

Mr. Conkle is an experienced patent litigation attorney. Mr. Conkle has practiced patent litigation since 2015. Mr. Conkle is an Associate at the firm of Russ



Case IPR2020-00267 Patent 8,432,173

August & Kabat. Mr. Conkle has experience litigating numerous patent

infringement litigation matter before U.S. district courts. Mr. Conkle has been

heavily involved with issues such as the validity of the claims of the '173 patent,

some of which overlap with the grounds presented in this IPR proceeding. Patent

Owner has expended significant resources in the co-pending litigation with Mr.

Conkle, and it wishes to continue using him as counsel in this IPR proceeding.

Patent Owner has executed a Power of Attorney authorizing Mr. Conkle to

serve as backup counsel in this IPR proceeding. Counsel for Patent Owner has

conferred with counsel for Petitioner regarding this motion, and counsel for

Petitioner does not oppose this motion.

II. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for Pro Hac Vice admission is accompanied by declaration of

Mr. Conkle, attesting to the facts required by the Board in Unified Patents, Inc. v.

Parallel Iron, LLC, No. IPR2013-00639 (P.T.A.B. Oct. 15, 2013) (Paper 10).

Dated: August 24, 2020

Respectfully submitted,

/Kent Shum/

Kent Shum (Reg. No. 61,117)

Russ August & Kabat

12424 Wilshire Blvd., 12th Fl.

Los Angeles, CA 90025

Phone: (310) 826-7474

Fax: (310) 826-6991

rak neodron@raklaw.com



CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on August 24, 2020, by filing this document through the Patent Review E2E system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

Marc J. Pensabene (Reg. No. 37,416) Laura Bayne Gore (Reg. No. 72,420) O'Melveny & Myers LLP Times Square Tower 7 Times Square New York, NY 10036 Telephone: (212) 326-2000

E-Mail: mpensabene@omm.com

E-Mail: lbayne@omm.com

Nicholas J. Whilt (Reg. No. 72,081) O'Melveny & Myers LLP 400 South Hope Street, 18th Floor Los Angeles, CA 90071

Telephone: (213) 430-6000 E-Mail: nwhilt@omm.com

Date: August 24, 2020 /Kent Shum/

Kent Shum (Reg. No. 61,117) RUSS AUGUST & KABAT 12424 Wilshire Blvd., 12th Fl. Los Angeles, CA 90025 (310) 826-7474

Attorney for Patent Owner

