

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.

ParkerVision, Inc.
Patent Owner

Case No. IPR2020-01265
U.S. Patent No. 7,110,444

**PETITIONER'S MOTION FOR ADMISSION
PRO HAC VICE OF MICHAEL J. SUMMERSGILL**

I. Statement of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 4 in the above captioned proceeding authorizing the parties to file motions for *pro hac vice* admission, Petitioner respectfully requests that the Patent Trial and Appeal Board (“Board”) admit Michael J. Summersgill *pro hac vice* in this proceeding, Case No. IPR2020-01265.

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) provides that “where the 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 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 Michael J. Summersgill *pro hac vice* in this proceeding.

1. Lead counsel, Grant K. Rowan, is a registered practitioner.
2. Counsel, Michael J. Summersgill, is an experienced litigator and has an established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion as Exhibit 1020 is the April 30, 2021 Declaration of Michael J. Summersgill in Support of this Motion for Admission *Pro Hac Vice* (“Summersgill Decl.”). In his declaration, Mr. Summersgill declares:

I am a member in good standing of the Bar of the Commonwealth of Massachusetts (Bar No. 81682). I am also admitted to practice before the Massachusetts Supreme Judicial Court, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the District of Massachusetts, and the United States District Court for the Eastern District of Michigan.

Summersgill Decl. ¶ 3 (Ex. 1020). Mr. Summersgill also asserts:

I am familiar with the subject matter at issue in these proceedings. I have reviewed the papers and exhibits filed in these proceedings. I also participated in drafting the Petitions for *Inter Partes* Review in these proceedings and have reviewed Patent Owner’s Preliminary Responses filed in these proceedings.

I am representing the Petitioners, Intel Corporation, in the following United States District Court case: *ParkerVision, Inc. v. Intel Corp.*, No. 6:20-cv-108-ADA (W.D. Tex.), which involves the patents at issue in these proceedings, as well as the prior art references at issue in these proceedings.

Summersgill Decl. ¶¶ 11-12 (Ex. 1020).

3. In his declaration, Mr. Summersgill 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* Summersgill Decl. ¶¶ 1-13 (Ex. 1020).

III. Conclusion

For the foregoing reasons, Petitioner respectfully requests that the Board admit Michael J. Summersgill *pro hac vice* in this proceeding. The undersigned authorizes the Office to charge \$250 to Deposit Account No. 08-0219 for the fees set forth in 37 C.F.R. § 42.15(e) for this *pro hac vice* motion. Please charge any shortage of fees or credit any overpayments to the above Deposit Account.

Respectfully Submitted,

/Brian J. Lambson/

Brian J. Lambson, Reg. No. 72,570
Wilmer Cutler Pickering
Hale and Dorr LLP

Dated: May 11, 2021

Table of Exhibits for U.S. Patent 7,110,444 Petition for *Inter Partes* Review

Exhibit	Description
1001	U.S. Patent No. 7,110,444 (“’444 patent”)
1002	Declaration of Dr. Vivek Subramanian Regarding U.S. Patent No. 7,110,444 (“Subramanian Decl.”)
1003	’444 patent File History
1004	U.S. Patent No. 6,230,000 (“Tayloe”)
1005	SN74CBT3253D Dual 1-of-4 FET Multiplexer/Demultiplexer (rev. ed. May 1998) (“TI Datasheet”)
1006	U.S. Patent No. 6,018,553 (“Sanielevici”)
1007	U.S. Patent No. 6,317,589 (“Nash”)
1008	U.S. Patent No. 4,985,647 (“Kawada”)
1009	U.S. Patent No. 5,764,693 (“Taylor”)
1010	“Modem,” <i>IEEE Standard Dictionary of Electrical and Electronics Terms</i> (4th ed. 1988)
1011	“Modem,” <i>McGraw-Hill Dictionary of Scientific and Technical Terms</i> , (5th ed. 1994)
1012	“Modem,” <i>Websters New World Dictionary of American English</i> (3rd ed. 1988)
1013	U.S. Patent No. 5,742,641 (“Dingsor”)
1014	“Capacitor,” <i>Microsoft Press Computer Dictionary</i> (2d ed. 1994)
1015	“Capacitor,” <i>IBM Dictionary of Computing</i> (10th ed. 1994)
1016	<i>ParkerVision v. Intel Corp.</i> , No. 6:20-cv-108-ADA, D.I. 24 (June 26, 2020) (“Trial Setting Order”)
1017	<i>ParkerVision v. Intel Corp.</i> , No. 6:20-cv-108-ADA, D.I. 25 (June 26, 2020) (“Markman Setting Order”)
1018	Patent Owner’s Preliminary Infringement Contentions, <i>ParkerVision v. Intel Corp.</i> , No. 6:20-cv-108-ADA (June 26, 2020)
1019	Declaration of Maureen M. Honeycutt (“Honeycutt Decl.”)
1020	Declaration of Michael Summersgill (“Summersgill Decl.”)
1021	Declaration of Todd Zubler (“Zubler Decl.”)

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