

IPR2022-00221

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

MEMORYWEB, LLC

Patent Owner

Patent No. 10,423,658

Inter Partes Review No. IPR2022-00221

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION
OF ANGELO J. CHRISTOPHER UNDER 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10 and the authorization provided by the Board in Paper 5 dated February 8, 2022 (“the Notice”), Patent Owner MemoryWeb, LLC (“Patent Owner”) submits this unopposed motion for Angelo J. Christopher to appear *pro hac vice*. Patent Owner respectfully requests for the Board to recognize Mr. Christopher as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so.

I. Timing

Pursuant to the authorization provided in the Notice, this motion for *pro hac vice* admission is being filed no sooner than twenty-one days after service of the Petition.

II. Statement of Facts

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Christopher *pro hac vice*.

Patent Owner’s lead counsel for this proceeding, Jennifer Hayes, is a registered practitioner (Reg. No. 50,845).

Mr. Christopher is an experienced litigation attorney with more than six (6) years of patent litigation experience in district courts and the International Trade Commission. Ex. 2029 at ¶ 8.

Mr. Christopher is counsel for Patent owner in the district court litigation (*MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics*

America Inc., No. 3:22-cv-03665-VC (N.D. Cal.)) where the ‘658 patent is asserted against Petitioner. Mr. Christopher has reviewed and is familiar with the ‘658 patent and the issues raised in the Petition in this proceeding. *Id.* at ¶ 9.

Mr. Christopher is a member in good standing in the State Bar of Illinois, the U.S. District Court for the Northern District of Illinois, and the U.S. Court of Appeals for the Federal Circuit. *Id.* at ¶ 1.

Mr. Christopher has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. *Id.* at ¶¶ 2-4.

Mr. Christopher has read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials set forth in Part 42 of Title 37 of the C.F.R and agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. 11.19(a). *Id.* at ¶¶ 5-6. Mr. Christopher has not appeared pro hac vice before the Office in the last three years. *Id.* at ¶ 7.

Mr. Christopher recently passed the U.S. Patent and Trademark Office Registration Examination and is awaiting final approval and his registration number from the Office of Enrollment and Discipline. *Id.* at ¶ 10. Patent Owner seeks to have Mr. Christopher participate in the deposition of Petitioner’s expert scheduled for March 27, 2023, but does not anticipate Mr. Christopher receiving his registration

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number by that time. *Id.* Patent Owner will submit updated mandatory notices once Mr. Christopher receives his registration number.

Therefore, Patent Owner submits that there is good cause for the Board to recognize Mr. Christopher as counsel *pro hac vice* during this proceeding.

III. Statement of Facts

This Motion is accompanied by the Declaration of Mr. Christopher. Ex. 2029.

Respectfully submitted,

Dated: March 17, 2023

By: /Jennifer Hayes/
Jennifer Hayes
Reg. No. 50,845
Nixon Peabody LLP
300 South Grand Avenue,
Suite 4100,
Los Angeles, CA 90071-3151
Tel. 213-629-6179
Fax 866-781-9391

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Motion for *Pro Hac Vice* Admission of Angelo J. Christopher under 37 C.F.R. § 42.10 together with all exhibits filed therewith was served on March 17, 2023, upon the following parties via electronic service:

IPR39843-0116IP1@fr.com

PTABInbound@fr.com

axf-ptab@fr.com

jjm@fr.com

in@fr.com

cgreen@fr.com

Counsel for Petitioner, Samsung Electronics Co., Ltd.

By: /s/ Jennifer Hayes

Lead Counsel for Patent Owner