

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO., LTD, MICRON TECHNOLOGY, INC.,  
MICRON SEMICONDUCTOR PRODUCTS, INC., and  
MICRON TECHNOLOGY TEXAS LLC  
Petitioner,

v.

NETLIST, INC.,  
Patent Owner.

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Case No. IPR2022-00996  
Patent No. 11,016,918

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**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*  
ADMISSION OF JASON G. SHEASBY UNDER 37 C.F.R. § 42.10(C)**

**I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Netlist, Inc. ("Netlist"), by and through its attorneys, respectfully requests that the Board admit Jason G. Sheasby *pro hac vice* in this proceeding. Petitioners do not oppose this motion.

**II. GOVERNING LAW, RULES, AND PRECEDENT**

Section 42.10(c) states as follows:

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. For example, 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.

### III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Jason G. Sheasby submitted herewith (EX2060), Netlist submits that a showing of good cause has been made and respectfully requests the *pro hac vice* admission of Jason G. Sheasby in this proceeding:

1. Patent Owner's Lead Counsel, Hong Annita Zhong, is a registered practitioner (Reg. No. 66,530) and a partner at the law firm of Irell & Manella LLP.
2. Mr. Sheasby is a partner at the law firm of Irell & Manella LLP, the same law firm as Lead and Back-up Counsel. *Id.* ¶ 3.
3. Mr. Sheasby is an experienced litigating attorney and has been litigating cases relating to patents for over 20 years, and has amassed substantial litigation experience during that time. *Id.* ¶ 4.
4. Mr. Sheasby is a member in good standing of the California State Bar. *Id.* ¶ 5.
5. Mr. Sheasby has never been suspended or disbarred from practice before any court or administrative body. *Id.* ¶ 5.

6. No application filed by Mr. Sheasby for admission to practice before any court or administrative body has ever been denied. *Id.* ¶ 6.
7. No sanctions or contempt citations have been imposed against Mr. Sheasby by any court or administrative body. *Id.* ¶ 7.
8. Mr. Sheasby has read and agrees to 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, Code of Federal Regulations. *Id.* ¶ 8.
9. Mr. Sheasby understands that he will be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* ¶ 9.
10. Mr. Sheasby has also appeared and been granted *pro hac vice* admission before the United States Patent and Trademark Office in IPR2012-00033, IPR2013-00242, IPR2014-01567, IPR2015-00370, IPR2015-00371, IPR2015-00372, IPR2015-00374, IPR2015-00375, IPR2015-00377, IPR2015-00378, IPR2018-00111, IPR2018-00215, IPR2018-00425, IPR2018-00472, IPR2018-00487, IPR2019-01081, IPR2019-01082, IPR2019-01083, CBM2019-00002, CBM2019-00003, CBM2019-00004, CBM2019-00005, IPR2019-01331, IPR2019-01332, IPR2019-01333, IPR2020-00090, IPR2020-00091,

IPR2020-00092, IPR2020-00095, IPR2020-00096, IPR2020-00097, IPR2020-00882, IPR2020-00975, IPR2020-00976, IPR2020-01101, IPR2021-00067, IPR2021-00071, IPR2021-01070, IPR2021-01073, IPR2021-01077, IPR2021-01163, IPR2021-01248, IPR2021-00966, IPR2021-00967, IPR2022-00615, IPR2022-00639, IPR2022-00076 and IPR2022-00075. He has also applied for *pro hac vice* admission in IPR2018-00465, but the proceeding was denied before the motion was approved. Mr. Sheasby is also concurrently applying for *pro hac vice* admission in IPR2022-00999. *Id.* ¶ 10.

11. Mr. Sheasby has an established familiarity with the subject matter at issue in this proceeding. Mr. Sheasby has acquired substantial understanding of the underlying legal and technological issues at stake in this and related proceedings. In particular, Mr. Sheasby was substantively involved in the preparation of the POPR submitted in this case. *Id.* ¶ 11.
12. Patent Owner has expended significant time and resources with Mr. Sheasby and wishes to rely on Mr. Sheasby as counsel in this proceeding as appropriate, including in additional capacities, such as

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