

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

VOLKSWAGEN GROUP OF AMERICA, INC.,  
Petitioner,

v.

NEO WIRELESS,  
Patent Owner.

---

Cases IPR2022-01537, IPR2022-01539, IPR2022-01567, IPR2023-00426  
Patents 10,075,941, 10,965,512, 10,447,450, 8,467,366

---

FORD MOTOR COMPANY,  
Petitioner,

v.

NEO WIRELESS LLC  
Patent Owner.

---

Cases IPR2023-00763, IPR2023-00764, IPR2023-00765, IPR2023-00766  
Patents 10,447,450, 10,965,512, 10,833,908, 10,075,941

AMERICAN HONDA MOTOR CO., INC.,  
Petitioner,

v.

NEO WIRELESS LLC  
Patent Owner.

---

Cases IPR2023-00790, IPR2023-00791, IPR2023-00793, IPR2023-00794,  
IPR2023-00797  
Patents 8,467,366, 10,075,941, 10,447,450, 10,833,908, 10,771,302

---

GENERAL MOTORS LLC, NISSAN NORTH AMERICA, INC., TESLA, INC.,  
AND AMERICAN HONDA MOTOR CO., INC.,  
Petitioner,

v.

NEO WIRELESS LLC  
Patent Owner.

---

Case IPR2023-00961  
Patent 10,965,512

---

GENERAL MOTORS LLC AND NISSAN NORTH AMERICA, INC.,  
Petitioner,

v.

NEO WIRELESS LLC  
Patent Owner.

---

Case IPR2023-00962  
Patent 10,447,450

GENERAL MOTORS LLC, NISSAN NORTH AMERICA, INC., AND TESLA  
INC.,  
Petitioner,

v.

NEO WIRELESS LLC  
Patent Owner.

---

Cases IPR2023-00963, IPR2023-00964  
Patents 10,447,450, 10,075,941

---

**DECLARATION OF XU ZHOU  
IN SUPPORT OF PATENT OWNER'S  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION  
OF XU ZHOU UNDER 37 C.F.R. § 42.10(c)**

I, Xu Zhou, declare as follows:

1. I am an attorney licensed to practice law in the State of Texas.
2. I am a member in good standing in all jurisdictions where I have been admitted to practice.
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application denied for admission to practice before any court or administrative body.
5. I have never had any sanctions or contempt citations imposed upon me by any court or administrative body.
6. I have 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 37 C.F.R.
7. I agree to be subject to the U.S.P.T.O. Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
8. I am an associate at the law firm of Caldwell Cassidy Curry PC.
9. I have practiced law in Texas since 2020, and the majority of my practice has consisted of patent related matters such as patent litigations.
10. My experience in patent litigations includes drafting pleadings and motions, taking and defending depositions, attending hearings and trials, leading

meet and confers, etc. Representative matters in which I am or was actively involved include:

- *VirnetX Inc. et al. v. Apple Inc.*, No. 6:12-cv-00855 (E.D.T.X.)
  - *Match Group, LLC v. Bumble Trading Inc.*, No. 6:18-cv-00080 (W.D.T.X.)
  - *Huawei Technologies Co. Ltd. v. Verizon Communications Inc. et al.*, No. 2:20-cv-00030 (E.D.T.X.)
  - *Neo Wireless, LLC v. Dell Technologies Inc. et al.*, No. 6:21-cv-00024 (W.D.T.X.)
  - *In re Neo Wireless, LLC Patent Litigation*, No. 2:22-md-03034 (E.D.M.I.)
  - *Nanoco Technologies Ltd. v. Samsung Electronics Co. et al.*, No. 2:20-cv-00038 (E.D.T.X.)
  - *BeSang Inc. v. Micron Technology, Inc. et al.*, No. 2:23-cv-00028 (E.D.T.X.)
  - *BeSang Inc. v. Intel Corporation*, No. 3:23-cv-00113 (D. Or.)
11. I have currently or previously appeared in the following matters:
- *Huawei Technologies Co. Ltd. v. Verizon Communications Inc. et al.*, No. 2:20-cv-00030 (E.D.T.X.)

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.