

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.,  
Petitioner,

v.

DODOTS LICENSING SOLUTIONS LLC,  
Patent Owner.

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Case IPR2023-00701  
Patent 8,510,407

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**DECLARATION OF MICHAEL BALLANCO IN SUPPORT OF  
PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Michael Ballanco, being duly sworn and upon oath, hereby declare the following:

1. I am a member in good standing of the State Bar of Virginia, District of Columbia, USDC Eastern District of Virginia, USDC Western District of Virginia, USDC Eastern District of Texas, and the United States Court of Appeals for the Federal Circuit.
2. I have not been suspended or disbarred from practice before any court or administrative body.
3. I have never had an application for admission to practice before any court or administrative body denied.
4. No sanction or contempt citation has been imposed against me by any court or administrative body.
5. 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 the Code of Federal Regulations.
6. I will be subject to the USPTO 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).
7. In the past three years, I have not applied for *pro hac vice* admission before the Board.

8. I am an experienced litigation attorney with over 9 years of experience representing clients in cases involving computer software and systems. I regularly litigate patent cases before various U.S. district courts around the country, the International Trade Commission, and the Court of Appeals for the Federal Circuit. Through my experience in patent litigation matters, I have represented clients in many phases of litigation including discovery, Markman hearings, jury trials, bench trials, and appeals. My biography is attached hereto as Appendix A.

9. I am intimately familiar with the issues and subject matter presented in this above-captioned inter partes review proceeding. For example, I have extensively reviewed the above identified patent, its prosecution history, the Petition for IPR (including the invalidity grounds therein, and the cited references) and all exhibits filed in this case.

10. I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Proceeding No.: IPR2023-00701

Attorney Docket: 39843-0149IP1

Respectfully submitted,

Date: \_\_\_\_\_ April 30, 2024 \_\_\_\_\_

\_\_\_\_\_/Michael Ballanco/\_\_\_\_\_

Michael Ballanco

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# APPENDIX A

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