

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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**PETITIONER'S UNOPPOSED MOTION FOR PRO HAC VICE  
ADMISSION OF MICHAEL BALLANCO UNDER 37 C.F.R. § 42.10(c)**

## UPDATED EXHIBIT LIST

- SAMSUNG-1001 U.S. Patent No. 8,510,407 to Kembel, et al. (“the ’407 Patent”)
- SAMSUNG-1002 Excerpts from the Prosecution History of the ’407 Patent (“the Prosecution History”)
- SAMSUNG-1003 Declaration of Dr. Douglas C. Schmidt
- SAMSUNG-1004 Curriculum Vitae of Dr. Douglas C. Schmidt
- SAMSUNG-1005 U.S. Patent No. 6,278,448 B1 (“Brown”)
- SAMSUNG-1006 U.S. Patent No. 6,449,638 B1 (“Wecker”)
- SAMSUNG-1007 U.S. Patent No. 5,793,368 (“Beer”)
- SAMSUNG-1008 U.S. Patent No. 6,789,263 B1 (“Shimada”)
- SAMSUNG-1009 U.S. Patent No. 6,088,340 (“Buchholz”)
- SAMSUNG-1010 U.S. Patent No. 6,819,345 B1 (“Jones”)
- SAMSUNG-1011 *HTML 4 Unleashed* (“Darnell”)
- SAMSUNG-1012 IPR2019-01279 Final Written Decision
- SAMSUNG-1013 U.S. Patent No. 6,342,907 B1 (“Petty”)
- SAMSUNG-1014 *Lenovo Holding Company, Inc. v. DoDots Licensing Solutions LLC*, No. 2021-1247, 2021 WL 5822248 (Dec. 8, 2021).
- SAMSUNG-1015 U.S. Patent No. 6,311,058 B1 (“Wecker 2”)
- SAMSUNG-1016 U.S. Patent No. 5,737,560 (“Yohanan”)
- SAMSUNG-1017 CNET News, “PointCast unveils free news service,”  
[https://web.archive.org/web/20110616130215/http://news.cnet.com/PointCast-unveils-free-news-service/2100-1023\\_3-204658.html](https://web.archive.org/web/20110616130215/http://news.cnet.com/PointCast-unveils-free-news-service/2100-1023_3-204658.html), last accessed Feb. 16, 2023

SAMSUNG-1018 Declaration of June Ann Munford

SAMSUNG-1019 *DoDots Licensing Solutions LLC v. Samsung Electronics Co., Ltd. et al.*, 6:22-cv-00535, W.D. Tex., filed May 24, 2022

SAMSUNG-1020 U.S. Patent No. 6,094,681 (“Shaffer”)

SAMSUNG-1021 RESERVED

SAMSUNG-1022 U.S. Patent No. 6,185,614 B1 (“Cuomo”)

SAMSUNG-1023 RESERVED

SAMSUNG-1024 Joint Claim Construction Statement, 6:22-cv-00535, W.D. Tex., filed May 15, 2023

SAMSUNG-1025 IPR2019-01279, Paper 40 (CAFC Decision)

SAMSUNG-1026 Email from Board dated November 15, 2023 authorizing  
Petitioner to file a Motion to Submit Supplemental Information

SAMSUNG-1027 Declaration of Michael Ballanco in Support of Pro Hac Vice  
Admission

Pursuant to 37 C.F.R. § 42.10(c), Petitioner respectfully requests that the Board recognize Michael Ballanco as counsel *pro hac vice* in this proceeding. Petitioner seeks the counsel of Michael Ballanco due to his experience in other patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on May 10, 2023.

Counsel for Petitioner conferred with counsel for Patent Owner prior to filing this motion, and Patent Owner does not oppose this motion. A deposition for this matter was noticed on April 30, 2024, and is scheduled for May 9, 2024.

### **I. Statement of Facts**

Michael Ballanco is a patent litigation attorney with more than 9 years of experience representing clients in cases involving computer software and electronic systems. Mr. Ballanco regularly litigates 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 his practice in such cases, Mr. Ballanco has gained substantial experience in jury trials, bench trials, discovery, Markman hearings, and appeals. Apart from a clerkship at the Court of Appeals for the Federal Circuit, Mr. Ballanco has spent his entire career at

Fish & Richardson P.C., focusing on patent litigation and patent issues.

Petitioner provides Appendix A, as evidence of Mr. Ballanco's biography.

Mr. Ballanco also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding and other *inter partes* review proceedings challenging other patents that have been asserted in Entropic Communications, LLC v. DISH Network Corp. et al., 2:23-cv-01043-JWH-KES (C.D. Cal.). Petitioner has invested significant financial resources in defending against the asserted patents, and Mr. Ballanco will be taking an active role with respect to the patent that is the subject of the present proceeding. Moreover, Petitioner has developed a particular relationship with Mr. Ballanco such that Petitioner desires to continue the relationship with Mr. Ballanco for the purpose of this proceeding.

## **II. Affidavit of Individual Seeking to Appear**

This Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Michael Ballanco. Accordingly, Petitioner submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Michael Ballanco as counsel *pro hac vice* during this proceeding.

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