UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC, Petitioner

v.

DAEDALUS PRIME LLC Patent Owner

Case IPR2023-01333 U.S. Patent No. 10,049,080

### PETITIONER MERCEDES-BENZ USA, LLC'S UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION OF DAMON M. LEWIS UNDER 37 C.F.R. § 42.10(c)

### Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

### Case IPR2023-01333 U.S. Patent No. 10,049,080

# **TABLE OF CONTENTS**

## Page

| I.   | INTRODUCTION                                 | 1 |
|------|--|---|
| II.  | STATEMENT OF FACTS                           | 2 |
| III. | GOOD CAUSE EXISTS FOR THIS MOTION            | 3 |
| IV.  | DECLARATION OF INDIVIDUALS SEEKING TO APPEAR | 4 |
| V.   | CONCLUSION                                   | 5 |

## **UPDATED LIST OF EXHIBITS<sup>1</sup>**

| Ex-1001 | U.S. Patent No. 10,049,080 to George et al. ("the '080 Patent")        |
|---------|--|
| Ex-1002 | Declaration of Dr. Trevor Mudge submitted in IPR2023-00567             |
| Ex-1003 | Curriculum Vitae of Dr. Trevor Mudge                                   |
| Ex-1004 | Prosecution History of the '080 Patent (Application No. 15/431,527)    |
| Ex-1005 | U.S. Patent Pub. No. 2011/0213950 to Mathieson et al. ("Mathieson")    |
| Ex-1006 | U.S. Patent Pub. No. 2009/0309243 to Carmack et al. ("Carmack")        |
| Ex-1007 | U.S. Patent Pub. No. 2008/0288748 to Sutardja et al. ("Sutardja '748") |
| Ex-1008 | U.S. Patent Pub. No. 2007/0083785 to Sutardja ("Sutardja '785")        |
| Ex-1009 | U.S. Patent Pub. No. 2011/0145615 to Rychlik et al. ("Rychlik")        |
| Ex-1010 | Prosecution History of U.S. Patent No. 9,569,278 ("the '278 Patent")   |
| Ex-1011 | INTENTIONALLY LEFT BLANK   |
| Ex-1012 | INTENTIONALLY LEFT BLANK   |
| Ex-1013 | INTENTIONALLY LEFT BLANK   |
| Ex-1014 | INTENTIONALLY LEFT BLANK   |

<sup>1</sup> Four-digit pin citations that begin with 0 are to the branded numbers added by Mercedes in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, or line numbers.

OCKF

RM

Δ

| Ex-1015 | INTENTIONALLY LEFT BLANK  |
|---------|---|
| Ex-1016 | INTENTIONALLY LEFT BLANK  |
| Ex-1017 | INTENTIONALLY LEFT BLANK  |
| Ex-1018 | INTENTIONALLY LEFT BLANK  |
| Ex-1019 | INTENTIONALLY LEFT BLANK  |
| Ex-1020 | Claim Mapping Table   |
| Ex-1021 | INTENTIONALLY LEFT BLANK  |
| Ex-1022 | U.S. Patent Pub. No. 2006/0095807 to Grochowski ("Grochowski")  |
| Ex-1023 | U.S. Patent Pub. No. 2012/0317568 to Aasheim ("Aasheim")  |
| Ex-1024 | Jeffrey C. Mogul et al., <i>Operating Systems and Asymmetric Single-ISA CMPs: The Potential for Saving Energy</i> , Hewlett-Packard Development Company, L.P. (2007)                |
| Ex-1025 | Juan Carlos Saez et al., <i>Operating System Support for Mitigating Software Scalability Bottlenecks on Asymmetric Multicore Processors</i> , ACM 978-1-4503-004-5/10/05 (2010)     |
| Ex-1026 | U.S. Patent No. 7,093,147 to Farkas et al. ("Farkas")   |
| Ex-1027 | Charles Lefurgy et al., <i>Energy Management for Commercial Servers</i> , Computer 39 (Dec. 2003).  |
| Ex-1028 | Yushi Shen et al., <i>Enabling the New Era of Cloud Computing:</i><br><i>Data Security, Transfer, and Management</i> (Information Science<br>Reference 2014).                       |
| Ex-1029 | Stefanos Kaxiras and Margaret Martonosi, <i>Computer Architecture Techniques for Power-Efficiency</i> , in Synthesis Lectures on Computer Architecture #4 (Morgan & Claypool 2008). |
| Ex-1030 | Vasanth Venkatachalam and Michael Franz, <i>Power Reduction Techniques For Microprocessor Systems</i> , 37 ACM Computing Surveys 195 (2005).  |

\_ iii \_

DOCKET

| Ex-1031 | Euiseong Seo et al., <i>Energy Efficient Scheduling of Real-Time Tasks on Multicore Processors</i> , 19 IEEE Transactions on Parallel and Distributed Systems 1540 (Nov. 2008).   |
|---------|---|
| Ex-1032 | Rakesh Kumar et al., <i>Single-ISA Heterogeneous Multi-Core</i><br><i>Architectures: The Potential for Processor Power Reduction</i> ,<br>Proceedings of the 36 <sup>th</sup> International Symposium on<br>Microarchitecture (MICRO-36 2003), IEEE Computer Society<br>(2003). |
| Ex-1033 | U.S. Patent No. 8,615,647 to Hum et al. ("Hum")   |
| Ex-1034 | Declaration of Dr. Robert Horst   |
| Ex-1035 | Curriculum Vitae of Dr. Robert Horst  |
| Ex-1036 | Declaration of Damon M. Lewis in Support of Motion for <i>Pro Hac Vice</i> Admission  |
| Ex-1037 | Declaration of Jiaxing (Kyle) Xu in Support of Motion for <i>Pro Hac Vice</i> Admission   |

DOCKET

# DOCKET



# 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.

