

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK INC. and
MEDIATEK USA INC.,
Petitioner,

v.

NIPPON TELEGRAPH AND TELEPHONE CORPORATION,
Patent Owner.

Case No. IPR2020-01404
Patent No. 7,280,551

**PETITIONERS' MOTION FOR PRO HAC VICE ADMISSION OF
NATHAN R. SPEED**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 7,280,551 (“the ’551 Patent”)
1002	File History for U.S. Patent No. 7,280,551 (“the ’551 FH”)
1003	Declaration of Tim A. Williams (“Williams”)
1004	Curriculum Vitae of Tim A. Williams
1005	U.S. Patent Appl. Pub. No. 2003/0206532 A1 (“Shpak”)
1006	U.S. Patent Appl. Pub. No. 2003/0169769 A1 (“Ho”)
1007	U.S. Patent Appl. Pub. No. 2003/0220112 A1 (“Bugeja”)
1008	U.S. Patent No. 6,560,292 (“Lundby”)
1009	U.S. Patent Appl. Pub. No. 2002/0159431 A1 (“Moulsley”)
1010	U.S. Patent No. 6,591,107 (“Sonetaka”)
1011	<i>Nippon Telegraph & Telephone Corp. v. MediaTek Inc.</i> , 6:20-cv-225-ADA (W.D. Tex.), Dkt. No. 1 (Complaint)
1012	<i>Nippon Telegraph & Telephone Corp. v. MediaTek Inc.</i> , 6:20-cv-225-ADA (W.D. Tex.), Dkt. No. 15 (Joint Motion to Extend Answer and Waiver of Service)
1013	<i>Nippon Telegraph & Telephone Corp. v. MediaTek Inc.</i> , 6:20-cv-225-ADA (W.D. Tex.), Dkt. No. 25 (Order Governing Proceedings – Patent Case)
1014	U.S. Patent Appl. Pub. No. 2003/0086437 A1
1015	U.S. Patent Appl. Pub. No. 2003/0171115 A1
1016	U.S. Patent Appl. Pub. No. 2003/0222818 A1
1017	U.S. Patent No. 7,215,928
1018	U.S. Patent No. 6,987,819
1019	U.S. Patent Appl. Pub. No. 2002/0193146 A1
1020	U.S. Patent No. 7,224,704
1021	U.S. Patent No. 6,426,723
1022	U.S. Patent No. 7,317,770
1023	U.S. Patent No. 6,862,271
1024	U.S. Patent No. 6,941,110
1025	U.S. Patent No. 7,106,715
1026	U.S. Patent No. 7,408,907
1027	U.S. Patent No. 7,301,924
1028	U.S. Patent No. 7,039,412
1029	Certified Translation of Kurosaki et al., “100Mbit/s SDM-COFDM over MIMO Channel for Broadband Mobile Communications,” Technical

	Reports of the Institute of Electronics, Information and Communication Engineers, AP 2001-96, RCS2001-135 (2001-10).
1030	U.S. Patent No. 6,895,443
1031	U.S. Patent No. 7,006,451
1032	U.S. Patent No. 7,020,110
1033	U.S. Patent No. 7,031,249
1034	U.S. Patent No. 7,076,263
1035	U.S. Patent Appl. Pub. No. 2003/0003863 A1
1036	U.S. Patent No. 7,133,677
1037	U.S. Patent No. 7,321,762
1038	U.S. Patent No. 7,352,718
1039	U.S. Patent No. 7,421,046
1040	U.S. Patent No. 7,570,929
1041	U.S. Patent No. 7,586,884
1042	U.S. Patent Appl. Pub. No. 2002/0022483 A1
1043	U.S. Patent Appl. Pub. No. 2002/0078235 A1
1044	U.S. Patent No. 7,092,374
1045	Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (Mar. 13, 2020)
1046	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (Apr. 15, 2020)
1047	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (May 8, 2020)
1048	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (June 18, 2020)
1049	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (July 2, 2020)
1050	U.S. Patent No. 6,411,608
1051	Internet Archive WayBack Machine, March 24, 2000, https://web.archive.org/web/20000324233339/http://standards.ieee.org/catalog/IEEE802.11.html
1052	Plaintiffs' Preliminary Infringement Contentions
1053	E-Mail from Judge Albright's Patent Clerk Regarding Case Management Conference

1054	Declaration of Nathan R. Speed in Support of Motion for Admission <i>Pro Hac Vice</i>
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I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3, Petitioners MediaTek Inc. and MediaTek USA Inc. respectfully request that the Board admit Nathan R. Speed *pro hac vice* in this proceeding, IPR2020-01404. Petitioners are concurrently seeking admission of Mr. Speed *pro hac vice* in related proceeding IPR2020-01555. Petitioners requested Patent Owner's position on this motion, but Patent Owner had not responded as of the filing of this motion.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

37 C.F.R. § 42.10(c) provides:

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 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 a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The facts here establish good cause for the Board to recognize Mr. Speed *pro hac vice* in this proceeding.

First, as set forth in Mr. Speed's declaration (Ex. 1054), Mr. Speed has an established familiarity with the subject matter at issue in these proceedings. He has worked on preparing and reviewing the materials submitted in this proceeding.

Second, Mr. Speed has extensive patent litigation experience and is expected to use his experience to support Lead Counsel during the proceeding, including during depositions. Good cause exists to have Petitioners appoint as counsel Mr. Speed, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Speed attests to all of the representations set forth in part 2(b) of Paper No. 7 from *Unified Patents v. Parallel Iron*, Case IPR2013-00639 (PTAB Oct. 15, 2013).

III. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Board admit Nathan R. Speed *pro hac vice* in this proceeding.

Respectfully submitted
MediaTek Inc. and MediaTek USA Inc.

Date: October 1, 2020

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on October 1, 2020, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Steven R. Daniels
Jiageng Lu
Michael D. Saunders

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Date: October 1, 2020

/Alexandra H. Kime/
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