

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

COMMSCOPE TECHNOLOGIES, LLC,  
Petitioner,

v.

DALI WIRELESS, INC.,  
Patent Owner.

---

IPR2022-01293  
U.S. Patent No. 10,334,499 B2

---

---

**PETITIONER COMMSCOPE TECHNOLOGIES LLC'S  
*UNOPPOSED* MOTION FOR  
*PRO HAC VICE* ADMISSION OF WILLIAM BULLARD**

---

## **I. Relief Requested**

Pursuant to 37 C.F.R. § 42.10(c), Petitioner CommScope Technologies LLC (“CommScope”) that has now been joined to this proceeding requests the Board admit William F. Bullard *pro hac vice* in this *inter partes* review proceeding.

This motion is unopposed. Good cause exists to grant this motion.

## **II. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding.**

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding, subject to the conditions set forth therein, and any others that the Board may impose. Petitioner sets forth the following facts in support of this Motion:

1. Lead counsel for Petitioner in this proceeding, Philip P. Caspers, is a registered practitioner.
2. William F. Bullard, is an experienced litigation attorney and has established familiarity with the subject matter at issue in this proceeding. Accompanying this Motion as Exhibit 1060, is the Declaration of William F. Bullard in Support of the Motion for Admission Pro Hac Vice (“Bullard Decl.”). In his declaration, Mr. Bullard attests, among other things, that he is a member in good standing of the Minnesota State Bar. Bullard Dec. ¶ 3. Mr. Bullard

further attests that he has been admitted to practice before the United States Court of Appeal for the Federal Circuit and United States District Courts for the District of Minnesota. Id. Mr. Bullard further attests that he has been practicing in the field of litigation since 2010, with the majority of that time focused specifically on patent litigation. Id. ¶ 2. In addition, Mr. Bullard attests that his familiarity with the subject matter at issue in this proceeding is demonstrated by his review of the patent at issue, the Petition for Inter Partes Review, the cited prior art, and the other evidence presented in this proceeding, as well as his representation of Petitioner CommScope in a district court action in which Dali has accused Petitioner CommScope of infringing the ‘499 patent. Id. ¶¶ 9-10.

3. In his declaration, Mr. Bullard attests to each of the required items set forth in 37 C.F.R. § 42.10(c). Id. ¶¶ 2-10.

4. Petitioner wishes to have Mr. Bullard represent it in matters involving the ‘499 patent because of his specific experience with the ‘499 patent. If this motion was denied, CommScope would be prejudiced because CommScope has already invested significant financial resources in Mr. Bullard’s work. It would take significant time and resources to educate another attorney regarding the ‘499 patent, the prior art at issue, the concurrent litigation, and the relevant

technology, all subjects with which Mr. Bullard is already intimately familiar.

## **II. Conclusion**

For the foregoing reasons, CommScope respectfully requests that the Board admit William F. Bullard *pro hac vice* in this proceeding.

Dated: August 22, 2023

Respectfully Submitted,

/Philip P. Caspers/  
Philip P. Caspers, Lead Counsel  
Reg. No. 33,227  
Capella Tower, Suite 4200  
225 South Sixth Street  
Minneapolis, MN 55402  
pcaspers@carlsoncaspers.com  
Phone: 612.436.9617  
Fax: 612.436.9605

## CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on August 22, 2023, a complete and entire copy of this Motion and the supporting Declaration of William F. Bullard (Exhibit 1060) was provided via electronic service to the Patent Owner by serving the correspondence address of record as follows:

<b>LEAD COUNSEL</b> David D. Schumann (Reg. No. 53,569) Folio Law Group PLLC 1200 Westlake Ave. N., Ste. 809 Seattle, WA 98109 Email: <a href="mailto:david.schumann@foliolaw.com">david.schumann@foliolaw.com</a> Tel: (206) 880-1802	<b>First BACKUP COUNSEL</b> Palani P. Rathinasamy (Reg. No. 63,541) Folio Law Group PLLC 1200 Westlake Ave. N., Ste. 809 Seattle, WA 98109 Email: <a href="mailto:palani@foliolaw.com">palani@foliolaw.com</a> Tel: (206) 880-1802
<b>BACK UP COUNSEL</b> Moses Xie (Reg. No. 74,491) Folio Law Group PLLC 1200 Westlake Ave. N., Ste. 809 Seattle, WA 98109 Email: <a href="mailto:Moses.xie@foliolaw.com">Moses.xie@foliolaw.com</a> Tel: (206) 880-1802	<b>BACK UP COUNSEL</b> Timothy Dewberry (Reg. No. 62,947) Folio Law Group PLLC 1200 Westlake Ave. N., Ste. 809 Seattle, WA 98109 Email: <a href="mailto:timothy.dewberry@foliolaw.com">timothy.dewberry@foliolaw.com</a> Tel: (206) 880-1802

/Philip P. Caspers/  
Philip P. Caspers, Lead Counsel  
Reg. No. 33,227