

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

WARD PARTICIPATIONS B.V.,
Patent Owner.

Case PGR2022-00007
Patent 10,992,480

**PETITIONER’S UNOPPOSED MOTION FOR PRO HAC VICE
ADMISSION OF ASHLEY A. BOLT UNDER 37 C.F.R. § 42.10(c)**

UPDATED EXHIBIT LIST

- SAMSUNG-1001 U.S. Patent No. 10,992,480 to Ward et al. (“the ’480 Patent”)
- SAMSUNG-1002 Excerpts from the Prosecution History of the ’480 Patent (“the Prosecution History”)
- SAMSUNG-1003 Declaration and Curriculum Vitae of Dr. Black
- SAMSUNG-1004 Complaint, *Ward Participations B.V v. Samsung Electronics Co. Ltd. et al.*, 6:21-cv-00806, W.D. Tex., Aug. 4, 2021
- SAMSUNG-1005 Stipulation by Petitioner
- SAMSUNG-1006 U.S. Patent No. 7,082,615 (“Ellison”)
- SAMSUNG-1007 U.S. Patent No. 6,549,626 (“Al-Salqan”)
- SAMSUNG-1008 PCT Publication No. WO 01/93212 (“Muir”)
- SAMSUNG-1009 U.S. Patent No. 6,683,954 (“Searle”)
- SAMSUNG-1010 EP Patent Application Pub. No. EP 1465092 (“Shen”)
- SAMSUNG-1011 EP Patent Application Pub. No. EP 1240568 (“Ansell”)
- SAMSUNG-1012 U.S. Patent No. 11,063,766 (“the ’766 Patent”)
- SAMSUNG-1013 PCT application PCT/NL2003/000436 (PCT Publication No. WO 2004/111751)
- SAMSUNG-1014 PCT application PCT/NL2004/000422 (PCT Publication No. WO 2004/111752)
- SAMSUNG-1015 Certified English Translation of the Hague Court Judgement, *DTS International B.V., v Samsung Electronics Benelux B.V., et al.*, C/09/577703 / HA ZA 19-793, May 13, 2020

SAMSUNG-1016 European Patent Office Preliminary Opinion for EP 1634140,
May 25, 2020

SAMSUNG-1017 European Patent Office Preliminary Opinion for EP 3229099,
May 27, 2020

SAMSUNG-1018 European Patent Office Decision to Revoke EP 1634140,
September 14, 2021

SAMSUNG-1019 U.S. Patent No. 5,872,917 (“Hellman”)

SAMSUNG-1020 U.S. Patent No. 7,801,775 (“Roseman”)

SAMSUNG-1021 U.S. Patent No. 6,898,288 (“Chui”)

SAMSUNG-1022 Excerpts from the Dictionary of Electrical & Computer
Engineering, McGraw-Hill, 2004

SAMSUNG-1023 Stipulation for Extension of Time to respond to Complaint, *Ward
Participations B.V v. Samsung Electronics Co. Ltd. et al.*, 6:21-
cv-00806, W.D. Tex., Aug. 23, 2021

SAMSUNG-1024-1026 [RESERVED]

SAMSUNG-1027 “2021 Discretionary Denials Have Passed 100, But Are Slowing,”
Dani Kass, Law360, July 15, 2021

SAMSUNG-1028 “Leahy And Cornyn Introduce Bipartisan Bill To Support
American Innovation And Reduce Litigation”, Sep. 29, 2021,
available at: <https://www.leahy.senate.gov/press/leahy-and-cornyn-introduce-bipartisan-bill-to-support-american-innovation-and-reduce-litigation>

SAMSUNG-1029 Restoring the America Invents Act, S. 2891, 117th
Cong. (2021).

SAMSUNG-1030 Declaration of Ashley A. Bolt in Support of Pro Hac Vice
Admission

Pursuant to 37 C.F.R. § 42.10(c), the Petitioner, Samsung Electronics Co., Ltd (“Samsung”) respectfully requests that the Board recognize Ashley A. Bolt as counsel *pro hac vice* in this proceeding. Samsung seeks the counsel of Ashley A. Bolt due to her experience in representing Samsung in other patent-related matters and particularly due to her 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 November 22, 2021.

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 has not been scheduled yet, but may occur shortly after this motion is filed depending on the outcome of on-going scheduling discussions between Petitioner and Patent Owner.

I. Statement of Facts

Ashley A. Bolt is a patent litigation attorney with more than 6 years of experience representing clients in cases involving electrical and computer technology. Ms. Bolt regularly litigates patent cases before various U.S. district courts around the country, the International Trade Commission, and the U.S. Court of Appeals for the Federal Circuit. Through her practice in such cases, Ms. Bolt has gained substantial experience in nearly all phases of litigation, from initial

pleadings through trial and appeal. Ms. Bolt has spent most of her career at Fish & Richardson P.C., focusing on patent litigation and patent issues. Samsung provides Appendix A, as evidence, Ms. Bolt's biography.

Ashley A. Bolt also has specific experience and familiarity with the substantive and technical issues involved in this *post grant* review proceeding and other *inter partes* review proceedings challenging patents that are at issue in IPR2022-00113, PGR2022-00007 and IPR2022-00114 and have been asserted in *Ward Participations B.V. v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, 6:21-cv-00806, W.D. Tex. Samsung has invested significant financial resources in each of these proceedings, and Ms. Bolt will be taking an active role with respect to the patent that is the subject of the present proceeding. Moreover, Samsung has developed a particular relationship with Ms. Bolt such that Samsung desires to continue the relationship with Ms. Bolt 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 Ashley A. Bolt. Accordingly, Samsung submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Ashley A. Bolt as counsel *pro hac vice* during this proceeding.

Dated: September 28, 2022

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on September 28, 2022, a complete and entire copy of this Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ashley A. Bolt and accompanying exhibit were provided by email to the Patent Owner by serving the correspondence address of record as follows:

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