

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD. and SAMSUNG ELECTRONICS
AMERICA, INC.,
Petitioners

v.

VB ASSETS, LLC,
Patent Owner

Case: IPR2025-00870
U.S. Patent No. 10,755,699

**PATENT OWNER'S NOTICE OF INTENT TO DESIGNATE
PROVISIONALLY RECOGNIZED PTAB ATTORNEY
ANDREW J. LIGOTTI UNDER 37 C.F.R. § 42.10(c)(2)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
US Patent and Trademark Office
PO Box 1450
Alexandria, Virginia 22313-1450

LIST OF EXHIBITS

Exhibit No.	Short Name	Description
2001	Ligotti Decl.	Declaration of Andrew J. Ligotti

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(c)(2) and the Notice of Filing Date Accorded to Petition (Paper No. 6), Patent Owner VB Assets, LLC (“Patent Owner”) hereby submits this notice of intent to designate provisionally recognized attorney Andrew J. Ligotti as backup counsel. The facts set forth below and the accompanying Certification in the form of a declaration by Mr. Ligotti, Ex. 2001 (“Ligotti Decl.”), support his *pro hac vice* admission.

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

A. Identity of the Registered Practitioner Who Will Serve as Lead Counsel

Patent Owner is represented by Christopher TL Douglas (Reg. No. 56,950) as lead counsel in this proceeding. *See* Paper Nos. 4-5.

B. The Most Recent Prior Proceeding in Which the Person Seeking to Appear Was Recognized *Pro Hac Vice* by Order of the Patent Trial and Appeal Board Pursuant to a Motion of the Type Described in 37 C.F.R. §42.10(c)(1)

The most recent prior proceeding in which Mr. Ligotti sought to appear and was recognized *pro hac vice* by order of the PTAB pursuant to a motion was *Intel Corporation v. InterDigital, Inc.*, IPR2024-01441 (PTAB Mar. 6, 2025). *See* Paper 9, ORDER Granting Patent Owner’s Motion for Admission *Pro Hac Vice* of Andrew J. Ligotti 37 C.F.R. § 42.10. Ligotti Decl., ¶8.

C. Requirements Enumerated in the Board’s Notice of Filing Date Accorded (Paper No. 6)

In his declaration, Mr. Ligotti attests to all facts required for *pro hac vice* admission.

Mr. Ligotti is a member in good standing of the bar of at least one state or the District of Columbia, specifically, New York. Ligotti Decl., ¶2.

Mr. Ligotti has not been suspended, disbarred, had his application denied, been sanctioned, or had a contempt citation imposed on him by any court or administrative body. *Id.*, ¶¶3-5.

Mr. Ligotti has read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials set forth in 37 CFR part 42. *Id.*, ¶6.

Mr. Ligotti agrees that he is subject to the USPTO Rules of Professional Conduct set forth in 37 CFR § 11.101 *et seq.* and disciplinary jurisdiction under 37 CFR § 11.19(a). *Id.*, ¶7.

The proceedings before the Office for which Mr. Ligotti has applied to appear *pro hac vice* in the last three years are:

- i. *Envirotainer AB v. DoubleDay Acquisitions LLC (d/b/a CSafe Global)*, IPR2022-00292, IPR2022-00293 (PTAB Aug. 11, 2022);
- ii. *Nokia Corp. v. TQ Delta, LLC*, IPR2022-00471 (PTAB Oct. 25, 2022);
- iii. *Envirotainer AB v. DoubleDay Acquisitions LLC (d/b/a CSafe Global)*, IPR2022-00851 (Nov. 30, 2022);

- iv. *Envirotainer AB v. DoubleDay Acquisitions LLC (d/b/a CSafe Global)*, IPR2022-00864 (Jan. 3, 2023);
- v. *Ford Motor Co. v. Massachusetts Institute of Technology*, IPR2021-00339, IPR2021-00340, IPR2021-00341 (PTAB Aug. 9, 2023); and
- vi. *Intel Corporation v. InterDigital, Inc.*, IPR2024-01441 (PTAB Mar. 6, 2025).

See id., ¶9.

Mr. Ligotti has familiarity with the subject matter at issue in the proceeding.

Id., ¶¶10-11.

III. CONCLUSION

Upon being deemed admitted *pro hac vice* under 37 C.F.R. § 42.10(c)(2)(iii), Patent Owner will file updated mandatory notices identifying Mr. Ligotti as counsel of record. *See* Paper 4. And Mr. Ligotti will keep the Board informed of sanctions, changes to good standing at a bar, or any other event that renders materially inaccurate or incomplete any representation that he made to the Board in connection with this request for *pro hac vice* notice. Ligotti Decl., ¶12.

Date: July 14, 2025

/Christopher TL Douglas/
Christopher TL Douglas
Reg. No. 56,950

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), the undersigned hereby certifies that true and correct copies of the above-captioned **PATENT OWNER'S NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY ANDREW J. LIGOTTI UNDER 37 C.F.R. § 42.10(c)(2) and VB ASSETS EXHIBIT 2001** were served in their entirety on July 14, 2025 via filing through the Patent Trial and Appeal Case Tracking System (P-TACTS) and electronic mail on the following counsel of record for Petitioner:

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Date: July 14, 2025

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