

IN THE SUPREME COURT OF THE UNITED STATES

KOJI IP, LLC, WILLIAM PETERSON RAMEY, III, JEFFREY E.
KUBIAK, SUSAN KALRA,
Sanctioned Parties-Applicants

v.

RENESAS ELECTRONICS AMERICA, INC.,
Defendant-Respondent

EMERGENCY APPLICATION TO STAY ENFORCEMENT OF PENAL
SANCTIONS PENDING APPEAL

On Application for Stay from the Court of Appeals for the Federal Circuit
In Case No. 25-1639 and Appeal from the United States District Court for
the Northern District of California in Case No. 3:24-cv-03089, Magistrate
Judge Peter H. Kang

DECLARATION OF WILLIAM P. RAMEY, III

Attorneys for Appellants:

Ramey LLP

/s/ William P. Ramey, III
William P. Ramey, III
Texas Bar No. 24027643
wramey@rameyfirm.com
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
(713) 426-3923

I, William Ramey, declare as follows:

1. My name is William P. Ramey, III. I am over the age of 21. I have personal knowledge of the facts contained herein, which are true and correct. If called as a witness, I could competently testify to these statements.

2. I am licensed to practice law in the state of Texas and am an attorney with the law firm of Ramey LLP. I represent the Plaintiff in the above-captioned lawsuit.

3. I was censored by Gene Quinn of IP Watchdog through the removal of my previously published articles and the scrubbing of my profile from the IP Watchdog website because of the Magistrate's Order.

4. Addendum bates range ADD1134-ADD1139 is a true and correct copy of a case filing from *In Tre Dreamland Baby Co. Weighted Sleep Products Litigation*, case number 3:24-cv-02996, where appearing attorneys use “*pro hac vice anticipated*,” as shown by the yellow highlight.

5. Addendum bates range ADD1140-ADD1156 is a true and correct copy of a case filing from *In re: Future Motion, Inc. Products Liability Litigation*, case number 23-md-03087, where appearing attorneys use “*pro hac vice anticipated*,” as shown by the yellow highlight.

6. Addendum bates range ADD1157-ADD1161 is a true and correct copy of a case filing from *In re Betterhelp, Inc. Data Disclosure Cases*, case number 3:23-cv-01033, where appearing attorneys use “*pro hac vice anticipated*,” as shown by the yellow highlight.

7. A stay of enforcement of the Magistrate’s Order¹ and a stay of the reporting/CLE requirements in the Magistrate’s Second Order² (collectively, “Penal Sanctions”) is appropriate because the Sanctioned Parties have a very high likelihood of success in reversing some if not all of the Penal Sanctions. Under the literal language of Rule 11, a monetary sanction is not allowed, as the case was closed prior to the issuance of the Order to Show Cause, and thus the Magistrate’s Order issuance of a monetary sanction under Rule 11 will be reversed.

8. A stay of the Penal Sanctions is warranted due to the irreparable harm the Sanctioned Parties will suffer if required during the pendency of this appeal to self-report to court and bar organizations. Further, irreparable harm has already occurred with the censorship referenced in paragraph 3. There can be no greater harm than the loss of your speech.

¹ ADD0038-ADD0082 at 38:24-43:2 (items 1-11).

² ADD0003-ADD0038 at 35:4-36:24 (items 4-8).

Based on the Magistrate’s Order, Gene Quinn took my speech and erased it. This alone establishes irreparable harm. Also, once reported to bar organizations, even if successful on appeal, the Sanctioned Parties will not be able to un-ring that bell. The Penal Sanctions require monetary payments to the Northern District of California and self-reporting to courts and bar organizations beginning on April 26, 2025. The harm is immediate and substantial. Relief from the Penal Sanctions is needed before April 26, 2025, to stop further irreparable harm.

9. No harm will befall Defendant as the Penal Sanctions sought to be stayed do not require payment to Defendant.

10. The public interest is best served in having this appeal heard before sanctions are issued and further irreparably harming three lawyers and the patent plaintiff’s practice as a whole.

11. On April 21, 2025, the Sanctioned Parties provided notice to the District Court and the Court of Appeals for the Federal Circuit that this application would be filed on April 22, 2025.

12. The Sanctioned Parties filed their Emergency Motion To Stay Enforcement Of Penal Sanctions Pending Appeal (“Emergency Motion”)³

³ SADD1291-SADD1326.

on April 12, 2025, after Magistrate Judge Kang denied, without a hearing, on April 9, 2025,⁴ the Sanctioned Parties' District Court Motion to Stay Penal Sanctions.⁵ After the Emergency Motion was filed in CAFC, Magistrate Judge Kang twice again modified the briefing schedule for the Penal Sanctions appealed to this Court⁶ and set an in person hearing on April 23, 2025, at 2:00 pm in San Francisco, California⁷ on the Sanctioned Parties' Motion that it previously denied.⁸

13. Additionally, the Penal Sanctions are now being cited by another district court in response to a motion pro hac vice filed by Mr. Ramey in another matter.⁹ That district court's order denying admission pro hac vice relies in part on the Penal Sanctions: "Ramey's extensive and pervasive unauthorized practice of law in this District, false

⁴ ADD0001-ADD0002.

⁵ ADD1111-ADD1128.

⁶ SADD1197-SADD1200.

⁷ SADD1197-SADD1198.

⁸ ADD1111-ADD1128.

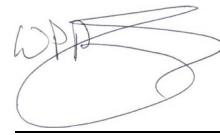
⁹ SADD1202-SADD1205 through error, the paralegal that filed the motion did not properly update the number of prior admission pro hac vice Mr. Ramey had in this District. SADD1209-SADD1210 at ¶ 5). However, that error was corrected on April 17, 2025.

representations regarding pro hac vice status, and related misconduct documented by Judge Kang in *Koji IP*.”¹⁰

14. The harm of the Penal Sanctions is immediate and resulted in Susan S.Q. Kalra resigning from her employment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2025.

A handwritten signature in blue ink, appearing to read 'WPR', is written over a horizontal line.

William P. Ramey, III

¹⁰ SADD1203.