UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD TRULIA, INC. Petitioner v. ZILLOW, INC. Patent Owner Case CBM2013-00056 Patent 7,970,674

PATENT OWNER ZILLOW, INC.'S MOTION FOR PRO HAC VICE ADMISSION UNDER 37 C.F.R. § 42.10



The Patent Owner ("Zillow") respectfully requests that the Board recognize Mr. Ramsey M. Al-Salam as counsel *pro hac vice* during this proceeding. Zillow seeks Mr. Al-Salam's assistance because of his experience assisting Zillow on patent-related matters and his experience on 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 entered on September 18, 2013.

1. Statement of Facts

Mr. Al-Salam is an experienced patent litigation attorney, with almost 30 years of experience in discovery, jury and bench trials, Markman hearings, and appellate oral arguments in patent infringement matters. Mr. Al-Salam's biography, including a list of representative cases, is attached as Exhibit A.

U.S. Patent No. 7,970,674 is currently involved in pending litigation against Trulia Inc. in the U.S. District Court for the Western District of Washington (civil action no. 2:12-cv-01549). Zillow is represented by Susman Godfrey LLP in this litigation; Mr. Al-Salam is not representing Zillow in the litigation. Accordingly, protective orders in the litigation do not apply to Mr. Al-Salam.

U.S. Patent No. 7,970,674 is currently involved in a pending *Inter Partes* Review (Case No. IPR2013-00034) before the Patent Trial and Appeal Board. Mr. Al-Salam has been admitted to appear as counsel *pro hac vice* in the pending *Inter*



Partes Review of U.S. Patent No. 7,970,674 and currently represents Zillow as back-up counsel in that proceeding.

Furthermore, Mr. Al-Salam has advised Zillow on various patent issues and has appeared as lead counsel for Zillow in multiple patent cases, including:

- 1. Smarter Agent v Boopsie, et al., No. 1:10-cv-00245-JJF-LPS (D. Del.)
- 2. Traffic Information v. Bank of America, et al., No. 2:11-cv-00343-MHS-CMC (E.D. Tex.)
- 3. I2Z Technology v. Microsoft, et al., No. 3:11-cv-01103-AC (D. Or.)
- 4. Earthcomber v. Zillow, No. 1:12-cv-00394-JHL (N.D. Ill.)
- 5. Ceats v. Zillow, No. 6:12-cv-00082-LED (E.D. Tex.)

Mr. Al-Salam was also lead counsel for Fiserv, Inc. in *Corelogic Information Solutions v. Fiserv, Inc.*, et. al., Case No. 2:10-cv-00132-RSP (E.D. Tex.), which involved automatic valuation techniques similar to those described in the '674 patent were at issue. Accordingly, Mr. Al-Salam is knowledgeable about the technology to which this proceeding relates.

Therefore, there is good cause for the Board to recognize Mr. Al-Salam as counsel *pro hac vice* during this proceeding.



3. Affidavit or Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by the required Affidavit of Mr. Ramsey M. Al-Salam.

Respectfully subpritted,

Steven D. Lawrenz

Registration No. 37,376

Lead Counsel for Patent Owner

AFFIDAVIT OF MR. RAMSEY M. AL-SALAM IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION

- I, Ramsey M. Al-Salam, being duly sworn and upon oath, hereby attests to the following:
- 1. I am a member in good standing of the Bar of Washington, as well as the following Federal Courts:
 - a. U.S. Supreme Court
 - b. U.S. Court of Appeals for the Federal Circuit
 - c. U.S. Court of Appeals for the Ninth Circuit
 - d. U.S. District Court for the Eastern District of Washington
 - e. U.S. District Court for the District of Colorado
 - f. U.S. District Court for the Northern District of Illinois
 - g. U.S. District Court for the Eastern District of Texas
- 2. 1 have not been suspended or disbarred from practice before any court or administrative body;
- 3. I have never had an application for admission to practice before any court or administrative body denied;
- 4. No sanction or contempt citation has been imposed against me by any court or administrative body;



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

