

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION

Petitioner

v.

YISSUM RESEARCH DEVELOPMENT COMPANY
OF THE HEBREW UNIVERSITY OF JERUSALEM

Patent Owner

Patent No. 7,477,284

Issue Date: January 13, 2009

Title: SYSTEM AND METHOD FOR CAPTURING
AND VIEWING STEREOSCOPIC PANORAMIC IMAGES

Inter Partes Review No. IPR2013-00219

**MOTION FOR *PRO HAC VICE* ADMISSION
PURSUANT TO 37 C.F.R. § 42.10**

As authorized by the Notice of Filing Date Accorded to Petition (Paper 6 at 2), Patent Owner Yissum Research Development Company of the Hebrew University of Jerusalem respectfully moves that the Board recognize Mr. William P. Nelson and Mr. Robert L. Gerrity as counsel *pro hac vice* during this proceeding. This motion is filed in accordance with the “Order Authorizing Motion for *Pro Hac Vice* Admission” in case IPR2013-00010. (See Paper 6 at 2.)

1. Time for Filing

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty one (21) days after service of the petition.

2. Statement of Facts Showing Good Cause for Counsel *Pro Hac Vice*

As required by the Order Authorizing Motion for *Pro Hac Vice*, the following statement of facts shows that there is good cause for the Board to recognize Mr. Nelson and Mr. Gerrity *pro hac vice*.

Mr. Nelson is special counsel at Tensegrity Law Group LLP, is an experienced litigation attorney, and has been involved in numerous litigations involving patent infringement in District Courts across the country. Mr. Nelson is a member of the California bar in good standing and is admitted to practice before the U.S. Court of Appeals for the Federal Circuit; the U.S. District Court for the Northern District of California; the U.S. District Court for the Southern District of

California; and the U.S. District Court for the Eastern District of Texas. He has experience in fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, jury and bench trials, investigations before the International Trade Commission, and oral arguments in connection with patent infringement litigation matters.

Mr. Gerrity is an associate at Tensegrity Law Group LLP, is an experienced litigation attorney, and has been involved in numerous litigations involving patent infringement in District Courts across the country. Mr. Gerrity is a member of the California bar in good standing and is admitted to practice in the U.S. District Court for the Northern District of California; the U.S. District Court for the Central District of California; the U.S. District Court for the Southern District of California; and the U.S. District Court for the Eastern District of Texas. He has experience in fact and expert document and deposition discovery, claim construction, motion practice, jury trials, and investigations before the International Trade Commission in connection with patent infringement litigation matters.

Mr. Nelson and Mr. Gerrity have an established familiarity with the subject matter at issue in this proceeding from their participation in co-pending litigation involving the subject patent.

Specifically, U.S. Patent No. 7,477,284 is currently asserted against Petitioner Sony Corporation in a co-pending litigation, *HumanEyes Technologies Ltd. V. Sony Electronics Inc. et al.*, No. 1:12-cv-00398-GMS (D.Del.), and was also asserted in the Matter of *Certain Cameras and Mobile Devices, Related Software and Firmware, and Components Thereof and Products Containing the Same*, Investigation No. 337-TA-842, United States Trade Commission (“the related litigations”). HumanEyes Technologies Ltd. is the exclusive licensee of U.S. Patent No. 7,477,284, and Mr. Nelson and Mr. Gerrity are counsel for HumanEyes Technologies Ltd. in the related litigations.

Mr. Nelson and Mr. Gerrity have analyzed prior art references and claims charts in connection with invalidity contentions, have been involved in forming claim construction positions, and conducted document and deposition discovery related to the claimed inventions all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 7,477,284. HumanEyes has expended significant resources in the related litigation with Mr. Nelson and Mr. Gerrity as its counsel, and the Patent Owner wishes to apply Mr. Nelson’s and Mr. Gerrity’s knowledge of the patent by employing them as counsel in this proceeding.

Further, Petitioner does not oppose Mr. Nelson or Mr. Gerrity appearing *Pro Hac Vice* during this proceeding.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Nelson and Mr. Gerrity as counsel *Pro Hac Vice* during this proceeding.

3. Affidavit or Declaration of Individuals Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by Affidavits of Mr. William P. Nelson (YRD-1001) and Mr. Robert L. Gerrity (YRD-1002) as required by the Order Authorizing Motion for *Pro Hac Vice* Admission.

Respectfully submitted,

By /David L. McCombs/
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Yissum Research Development
Company of
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