

## Katherine D. Cappaert

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**From:** Roberto Devoto <devoto@fr.com>  
**Sent:** Tuesday, April 28, 2015 5:33 PM  
**To:** Michael L. Kiklis; CP Docket McKeown; CP Docket Kiklis; CP Docket Laurence; CP Docket Cappaert; CPDocketRicciuti; CP Docket Cappaert  
**Cc:** Karl Renner; David Holt; David Healey; Edward Faeth  
**Subject:** Motion for Pro Hac Vice - IPR2014-00687; 00688; 00689; 01475; 01477; 01478

Dear Michael,

In view of our recent joining of these proceedings and the upcoming deposition on 4/30/15, ION intends to file tomorrow morning a Motion for Pro Hac Vice admission to allow our colleague, David Healey, to observe the deposition scheduled on 4/30/15. We wish to designate David to represent ION at the deposition because: (1) unlike Karl (lead counsel) and me (backup counsel), he is located in Houston, Texas and the deposition is in Houston, Texas; and (2) he has been involved in the counterpart litigation on behalf of ION over the same patents at issue in these proceedings, which makes him uniquely equipped to act on ION's behalf in these matters.

Please let us know if you intend to oppose our Motion by tomorrow at 9am EST, if possible. Apologies for the short time fuse on this.

Additionally, if we encounter problems in filing our motion due to the peculiarities of PRPS in a situation of joinder, we may have to schedule a call with the Board tomorrow to ensure that we are able to properly file the Motion via PRPS and ensure that the Motion is considered by the Board in an expedited fashion in advance of the deposition on 4/30/15. With that in mind, please let us know your availability for a Board call, if needed, tomorrow morning.

If you wish to discuss any or all of the above, please feel free to call me at (703)731-8596. Otherwise, we look forward to hearing back from you regarding: (1) whether you will be opposing our motion; and (2) your availability tomorrow morning for a Board call if needed.

Thank you,

-Rob

ION Backup Counsel

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