

Filed on behalf of Intellectual Ventures II LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC. and

TELEFONAKTIEBOLAGET LM ERICSSON
Petitioner

v.

INTELLECTUAL VENTURES II LLC
Patent Owner

Case IPR2014-01195
Patent No. 7,787,431

**PATENT OWNER MOTION FOR ADMISSION
PRO HAC VICE OF RAJENDRA A. CHIPLUNKAR**

I. Statement Of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3 authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), Patent Owner requests that the Patent Trial and Appeal Board (“Board”) admit Rajendra A. Chiplunkar (“Mr. Chiplunkar”) *pro hac vice* in this proceeding, IPR2014-01195. This motion is filed in accordance with the “Order Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639, Paper 7.

Counsel for Petitioner has stated that Petitioner will not oppose this motion for admission *pro hac vice* of Mr. Chiplunkar.

II. Time for Filing

This Motion is being filed no sooner than twenty one (21) days after service of the Petition.

III. Statement of Facts Showing Good Cause for the Board to Recognize Counsel Pro Hac Vice During the Proceeding

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, “subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose.” Section 42.10(c) further states that “where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an

experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize Rajendra A. Chiplunkar *pro hac vice* in this proceeding.

1. Lead counsel, Herbert D. Hart III, is a registered practitioner. Backup counsel, Sharon A. Hwang is also a registered practitioner.

2. Mr. Chiplunkar is an associate at the law firm of McAndrews, Held and Malloy, Ltd., is a litigation attorney, and is currently involved in lawsuits involving patent infringement in District Courts across the country. Mr. Chiplunkar is a member of the Illinois bar in good standing, is admitted to practice in the U.S. District Court for the Northern District of Illinois and has also been admitted to practice *pro hac vice* in other Federal District courts. Mr. Chiplunkar has experience in fact and expert document and deposition discovery and motion practice before U.S. District Courts in connection with patent infringement litigation matters.

3. Prior to entering the field of law, Mr. Chiplunkar was employed with Motorola Inc. for over ten years as an electrical engineer. At Motorola, Mr. Chiplunkar contributed to the design of telecommunications equipment. Through his work at Motorola Inc., Mr. Chiplunkar gained valuable experience in the technologies relevant to the challenged Patent and the alleged prior art references.

4. Mr. Chiplunkar has spent substantial time reviewing and analyzing the patent at issue in this proceeding, its file history, the Petition, the references cited, and the Declarations of Dr. Haas, the Petitioner's Expert. Mr. Chiplunkar is familiar with the invalidity arguments advanced by the Petitioner. Additionally, Mr. Chiplunkar substantively contributed to the Patent Owner Response filed in this proceeding. Further, Mr. Chiplunkar has attended the cross-examination of Petitioner's Expert Declarant, Dr. Haas and the cross-examination of Patent Owner's Expert Declarant, Dr. Zeger.

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

IV. Affidavit or Declaration of Individuals Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by the Declaration of Mr. Rajendra A. Chiplunkar (Ex. 2005) as required by the Order Authorizing Motion for *Pro Hac Vice* Admission.

Dated: August 6, 2015

Respectfully submitted,

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IPR2014-01195

Patent Owner Motion for Admission Pro Hac Vice of Rajendra Chiplunkar

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