

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC., HTC CORPORATION, HTC AMERICA, INC., SAMSUNG  
ELECTRONICS CO. LTD, SAMSUNG ELECTRONICS AMERICA, INC., AND  
AMAZON.COM, INC.  
Petitioners,

v.

MEMORY INTEGRITY, LLC  
Patent Owner

U.S. Patent No. 7,296,121

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*Inter Partes* Review Case No. IPR2015-00163

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**PETITIONER APPLE INC.'S  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION  
UNDER 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), the Petitioner, Apple Inc. (“Apple”), respectfully requests that the Board recognize Michael Rueckheim as counsel *pro hac vice* in this proceeding. Apple seeks the counsel of Mr. Rueckheim due to his experience in representing Apple in patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition that was mailed on November 10, 2014.

On July 21, 2015, Apple contacted counsel for the Patent Owner, Michael Saunders at Farney Daniels PC, to discuss the Patent Owner’s position on this motion. Mr. Saunders stated that the Patent Owner does not oppose this motion.

### **1. Statement of Facts**

Mr. Rueckheim is a patent litigation attorney with 6 years of experience representing clients in patent cases involving technologies such as memory, computer architecture, wireless transmission, and software. Apple provides Exhibit A, as evidence, which is Mr. Rueckheim’s biography.

Mr. Rueckheim has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding. Mr. Rueckheim is counsel for Apple in the co-pending litigation involving the patent at issue in this proceeding, U.S. Patent. No. 7,296,121 (“the ’121 patent”):

Case No. 1:13-cv-01796-GMS (*Memory Integrity LLC v. Apple Inc.*) in the United States District Court for the District of Delaware, filed on November 1, 2013. As counsel for Apple, Mr. Rueckheim is deeply involved in all aspects of the litigation, including claim construction and validity analysis, and therefore has established familiarity with the '121 patent. Given Mr. Rueckheim's experience with the '121 patent, admission of Mr. Rueckheim *pro hac vice* will enable Apple to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Apple will also maintain registered practitioners as lead and back-up counsel as indicated in Paper No. 1 at 2: W. Karl Renner, Reg. No. 41,265 (lead counsel) and Roberto Devoto, Reg. No. 55,108 (backup counsel).

## **2. Affidavit of Individual Seeking to Appear**

This Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Mr. Rueckheim as required by the Order Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639 at Paper 7.

Accordingly, Apple submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Mr. Rueckheim as counsel *pro hac vice* during this proceeding.

Proceeding No.: IPR2015-00163  
Attorney Docket: 39521-0007IP4

Respectfully submitted,

Date: July 21, 2015

/s/ W. Karl Renner

W. Karl Renner

Reg. No. 41,265

Counsel for Petitioner Apple Inc.

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