

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WhatsApp Inc. and Facebook, Inc.
Petitioner

v.

TriPlay Inc.
Patent Owner

Case IPR2015-00740
U.S. Patent No. 8,332,475

**PETITIONERS' CORRECTED MOTION FOR *PRO HAC VICE* ADMISSION
UNDER 37 C.F.R. § 41.10(c)**

Petitioners WhatsApp Inc. and Facebook, Inc. respectfully request that the Board recognize Reuben Chen, Esq., as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Petitioners' Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the "Order—Authorizing Motion for *Pro Hac Vice* Admission" in Case No. IPR2013-00639 (MPT) ["the Order"].

II. STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Chen *pro hac vice*.

Mr. Chen is an experienced litigation attorney and has been involved in numerous complex litigations in state and federal courts. Mr. Chen's biography is attached hereto as Exhibit 1009.

Mr. Chen has reviewed U.S. Patent No. 8,332,475, and the petition already filed in this proceeding. Further, Mr. Chen is familiar with the pending litigation between the parties pending before the U.S. District Court for Delaware entitled *Triplay, Inc. et al. v. WhatsApp Inc.*, Case No. 1:13-cv-01703-LPS; and, as such, is familiar with the subject matter at issue in this proceeding.

Therefore, Petitioners respectfully submit that there is good cause for the

Board to recognize Mr. Chen as counsel *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioners' Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Reuben Chen, filed as Exhibit 1010, as required by the Order.

Dated: April 3, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Sections 42.6 and 42.105, that a complete copy of the attached PETITIONERS' CORRECTED MOTION FOR PRO HAC VICE ADMISSION (REUBEN CHEN), and related documents, are being served via electronic mail on the 6th day of April, 2015, the same day as the filing of the above-identified document in the United States Patent and Trademark Office/Patent Trial and Appeal Board, upon counsel of record for the Patent Owner as follows:

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DATED: April 6, 2015

/ Heidi L. Keefe /
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