

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner

v.

PAICE LLC and THE ABELL FOUNDATION, INC.,
Patent Owners

Case IPR2015-00758
Patent 7,237,634

**PATENT OWNERS PAICE LLC & THE ABELL FOUNDATION, INC.
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF DANIEL A.
TISHMAN UNDER 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), the Patent Owners (“PAICE LLC & THE ABELL FOUNDATION, INC.,” hereinafter “Paice & Abell”) respectfully request that the Board recognize Daniel A. Tishman as counsel *pro hac vice* in this proceeding. Patent Owner seeks the counsel of Daniel A. Tishman due to his experience in representing Paice & Abell in other 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 and Time for Filing Patent Owner Preliminary Response that was mailed on March 5, 2015.

Petitioner does not oppose this *pro hac vice* motion.

Statement of Facts

Mr. Tishman is a patent litigation attorney whose practice focuses on patent litigation in Federal District Courts and Section 337 proceedings before the International Trade Commission. He has been involved in cases covering a broad range of technologies, including complex computer software, television tuners, micro-electromechanical systems, consumer mobile handsets, and hybrid-electric vehicles. Through his practice in such cases, Mr. Tishman has gained substantial experience in all aspects of patent litigation, including discovery procedures, motions practice, depositions, Markman hearings, and trials. Mr. Tishman began

his legal career as a judicial clerk for the Honorable Judge Yvette P. Kane of the District Court for the Middle District of Pennsylvania from 2011-2013. Mr. Tishman received his J.D., *summa cum laude*, from Tulane Law School in 2011, where he was a managing editor of the Tulane Law Review. He received a B.S. in Information Sciences and Technology from the Pennsylvania State University in 2007. Paice & Abell provide Appendix A, as evidence, Daniel Tishman's biography.

Mr. Tishman also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding: Mr. Tishman represents Paice & Abell in two related matters: *Paice LLC, et. al. v. Hyundai Motor Co., et. al.*, No. CIV. WDQ-12-0499 (D. Md.) and *Paice LLC, et. al. v. Ford Motor Company*, No. CIV. WDQ-14-cv-00492 (D. Md.). Both cases are currently pending in the U.S. District Court for the District of Maryland, and both involve U.S. Patent 7,237,634, as well as other patents in the same family. Paice & Abell have invested significant financial resources in each of these related matters in which Mr. Tishman is serving as counsel. Moreover, through his representation in the related matters, Paice & Abell have developed a particular relationship with Mr. Tishman such that Paice & Abell desire to continue the relationship with Mr. Tishman for the purpose of this proceeding.

1. Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Daniel A. Tishman as required by the Order Authorizing Motion for *Pro Hac Vice* mailed March 5, 2015.

Accordingly, Patent Owners, Paice LLC & The Abell Foundation, Inc., submit that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Daniel A. Tishman as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Date: December 30, 2015

/ Linda L. Kordziel /
Linda L. Kordziel
Reg. No. 39,732
Counsel for Petitioner

Customer Number 26171
Fish & Richardson P.C.
Telephone: (202) 626-6432
Facsimile: (202) 783-2331

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on December 30, 2015, a complete and entire copy of this Patent Owners Paice LLC & The Abell Foundation, Inc. Unopposed Motion for *Pro Hac Vice* Admission Of Daniel A. Tishman under 37 C.F.R. § 42.10(c) and its exhibit, were provided via email to the Petitioner by serving the correspondence email addresses of record as follows:

Frank A. Angileri, John P. Rondini
John M. Halan, Todd W. Dishman
Brooks Kushman P.C.
1000 Town Center
Twenty-Second Floor
Southfield, Michigan 48075
Email: FPGP0104IPR4@brookskushman.com

Lissi Mojica
Kevin Greenleaf
Dentons US LLP
233 South Wacker Drive, Suite 7800
Chicago, IL 60606-6306
Email: iptdocketchi@dentons.com

/Susan C. Johnson/
Susan C. Johnson
Fish & Richardson P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
(214) 292-4086