

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION,
Petitioner,

v.

RAYTHEON COMPANY,
Patent Owner.

Case IPR2016-00209
Patent 5,591,678

**UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF JENNIFER
SERAPHINE**

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioner Sony Corporation requests that the Board admit Jennifer Seraphine *pro hac vice* in this proceeding.

II. 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, subject to the conditions set forth therein, and any others that the Board may impose. Petitioner sets forth these facts in support of this motion:

1. The undersigned contacted counsel for patent owner Raytheon Company, Tom Filarski, who indicated that Patent Owner did not plan to oppose Ms. Seraphine's admission *pro hac vice*.

2. Lead counsel for the proceeding, Matthew A. Smith (counsel for Sony Corporation) is a registered practitioner.

3. Jennifer Seraphine is an experienced litigator and has established familiarity with the subject matter at issue in this proceeding.

Accompanying this motion as Ex. 1015, the Declaration of Jennifer Seraphine in Support of this Motion for Admission *Pro Hac Vice*

("Seraphine Dec."). In her declaration, Ms. Seraphine attests, among other things, that she is a member in good standing of the State Bars of California, New York, and the District of Columbia, as well as an inactive member of

the State Bar of Florida. Seraphine Dec. ¶ 2. Ms. Seraphine further attests that she is a member in good standing of several United States District and Appellate Courts. *Id.* Ms. Seraphine has over seventeen years of experience in patent litigation. *Id.* ¶¶ 1-3. In addition, Ms. Seraphine's familiarity with the subject matter at issue in this proceeding is demonstrated by her review of the '678 patent and the cited prior art and her assistance in drafting the petition for *inter partes* review. *Id.* ¶ 9.

4. In her declaration, Ms. Seraphine also attests as to her admission to practice in other courts, and also to each of the required items set forth by 37 C.F.R. §42.10(c). *See* Seraphine Dec. ¶¶ 2, 4-8.

III. Conclusion

For the foregoing reasons, Petitioner respectfully requests that the Board admit Seraphine *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: March 25, 2016

By: Matthew A. Smith
Matthew A. Smith
Registration No. 49,003
Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Unopposed Motion for Admission *Pro Hac Vice* of Jennifer Seraphine was served on March 25, 2016 by electronic mail on the Patent Owner's counsel: tfilarski@step toe.com, sschlitter@step toe.com, dstringfield@step toe.com, and 678IPR@step toe.com.

By: /Matthew A. Smith/
Matthew A. Smith
Registration No. 49,003
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