### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

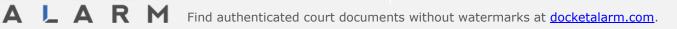
PLAID TECHNOLOGIES INC. Petitioner

v.

YODLEE, INC. Patent Owner

Case IPR2016-00273 Patent 6,317,783

PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)



DOCKET

# EXHIBIT LIST

Exhibit No.	Description
2001	ESPN Insider: Benefits, WayBackMachine, June 22, 2001
2002	Declaration of David Barkan in Support of Motion for <i>Pro Hac</i> <i>Vice</i> Admission
2003	Declaration of Matthew McCullough in Support of Motion for <i>Pro Hac Vice</i> Admission

Pursuant to 37 C.F.R. § 42.10(c), the Patent Owner ("Yodlee, Inc") respectfully requests that the Board recognize Matthew McCullough as counsel *pro hac vice* in this proceeding. Patent Owner seeks the counsel of Matthew McCullough due to his familiarity with the substantive and technical issues involved in this proceeding, which he gained in the course of working on this IPR and another CBM petition involving this same patent (CBM2016-00045). 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 December 11, 2015.

#### **Statement of Facts**

Mr. McCullough is a patent litigation attorney with experience representing clients in patent cases involving a wide range of products and technology, including cloud-based enterprise software, video game systems, data compression algorithms, mobile device software and hardware, and other consumer products. . Mr. McCullough has tried intellectual property cases before juries in a number of US district courts as well as before the US International Trade Commission. He has a background in computer engineering and in addition to patent litigation, Mr. McCullough also assists clients with trade secret litigation, patent due diligence, trade secret due diligence, and other non-litigation related patent analysis. Patent Owner Yodlee, Inc. submits as evidence Exhibit A, Matthew McCullough's biography.

Mr. McCullough also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding. Mr. McCullough has assisted Yodlee, Inc. with a number of other *inter partes* review and covered business method review proceedings, including one (CBM2016-00045) that concerns the patent at issue in the present matter, U.S. Patent No. 6,317,783. Yodlee, Inc. has invested significant financial resources on each of the matters on which Mr. McCullough has worked and what is more, they have come to trust and respect Mr. McCullough, so that they understandably wish to continue working with him on the present matter.

#### 1. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Matthew McCullough as required by the Order Authorizing Motion for *Pro Hac Vice* mailed December 11, 2015.

Accordingly, Patent Owner submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Matthew McCullough as counsel P*ro Hac Vice* during this proceeding. Respectfully submitted,

Date: July 7, 2016

/David M. Hoffman/

David M. Hoffman Reg. No. 54,174

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Counsel for Patent Owner Yodlee, Inc.

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