

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)**

**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 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 *Pro Hac Vice* during this proceeding.

Respectfully submitted,

Date: July 7, 2016

/David M. Hoffman/

David M. Hoffman  
Reg. No. 54,174

Fish & Richardson P.C.  
3200 RBC Plaza  
60 South Sixth Street  
Minneapolis, MN 55402  
T: (512) 226-8154  
F: (512) 320-8935  
Email: IPR12233-0047IP1@fr.com

Counsel for Patent Owner  
Yodlee, Inc.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.