

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR COMPANY LTD., HYUNDAI MOTOR AMERICA,
HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC, KIA MOTORS
CORPORATION, KIA MOTORS AMERICA, INC.,

KIA MOTORS MANUFACTURING GEORGIA, INC., NISSAN NORTH
AMERICA, INC., NISSAN MOTOR CO., LTD., and AMERICAN HONDA
MOTOR CO., INC.,

Petitioner,

v.

BLITZSAFE TEXAS, LLC,

Patent Owner.

Case IPR2016-00418¹

Patent 8,155,342 B2

**NISSAN MOTOR CO., LTD. AND NISSAN NORTH AMERICA, INC.'S
MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)**

¹ Cases IPR2016-01533, IPR2016-01557, and IPR2016-01560 have been joined with this proceeding.

Petitioners Nissan Motor Co., Ltd. and Nissan North America, Inc. (collectively “Petitioners”) hereby submit this Motion for *Pro Hac Vice* admission for Mr. Michael T. Murphy. Petitioners respectfully move that the Board recognize Mr. Murphy as counsel *pro hac vice* during this proceeding pursuant to 37 C.F.R. §42.10(c).

1. Time for Filing

Petitioners note that this Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty-one (21) days after service of the petition. *See Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper No. 7.

2. Statement of Facts Showing Good Cause for Admission of Counsel *Pro Hac Vice*

Petitioners have been authorized to file a motion seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (IPR2016-01560, Paper No. 5). Petitioners’ Lead and other Back-Up Counsel are registered practitioners: Lead Counsel: David L. Tarnoff, USPTO Reg. No. 32,383; and Back-Up Counsel: Sean N. Hsu, USPTO Reg. No. 69,477; and Suzanne E. Konrad, USPTO Reg. No. 60,517.

Mr. Murphy is an experienced patent litigation attorney, and his firm, Global IP Counselors, LLP, handles a significant amount of patent prosecution work for Nissan North America, Inc. In particular, Mr. Tarnoff and Mr. Murphy have worked together to counsel Petitioners on intellectual property issues related to Petitioners’

business including technologies relating to this proceeding. If admitted, Mr. Murphy will be involved with the proceeding, including its settlement and termination.

Petitioners wish to apply Mr. Murphy's knowledge of the subject matter related to this proceeding, as well as Mr. Murphy's litigation experience, by employing him as counsel in this proceeding.

Petitioners respectfully submit that there is good cause for the Board to recognize Mr. Murphy as counsel *pro hac vice* during this proceeding.

3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Mr. Murphy (Ex. 3004).

Date: February 2, 2017

Respectfully submitted,

/David L. Tarnoff/

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Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c) and AFFIDAVIT IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION OF MICHAEL T. MURPHY were served on February 2, 2017 upon the following parties via Express delivery:

Ira M. Marlowe
BLITZSAFE OF AMERICA, INC.
33 Honeck Street Englewood, NJ 07631

Courtesy Copies of the attached UPDATED MANDATORY NOTICE were also served via e-mail to the following parties:

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