

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICROSOFT CORPORATION,  
*Petitioner*

v.

BRADIUM TECHNOLOGIES LLC,  
*Patent Owner*

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Case IPR2016-00448  
U.S. Patent No. 7,908,343 B2

**MOTION FOR *PRO HAC VICE* ADMISSION  
OF MICHAEL N. ZACHARY**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner respectfully requests the *pro hac vice* admission of Michael N. Zachary as backup counsel for Patent Owner in the current proceedings. A declaration made by Mr. Zachary in support of this motion is attached hereto as Exhibit A.

**1. Statement of Facts**

1. Mr. Zachary is a litigation attorney experienced in patent cases, and is admitted to practice law in California, Oregon, and Washington State, as well as the following Federal Courts:

U.S. District Court for the Central District of California;

U.S. District Court for the Eastern District of California;

U.S. District Court for the Northern District of California;

U.S. District Court for the Southern District of California;

U.S. District Court for the District of Colorado;

U.S. District Court for the District of Oregon;

U.S. District Court for the Eastern District of Texas;

U.S. District Court for the Eastern District of Washington;

U.S. District Court for the Western District of Washington.

2. Mr. Zachary has not had any application denied for admission to practice, nor has he been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.

3. Mr. Zachary has an established familiarity with the subject matter at issue in this proceeding, having represented Patent Owner in *inter partes* review proceedings (*Microsoft Corp. v. Bradium Techs. LLC*, Cases IPR2015-01432, IPR2015-01434 and IPR2015-01435) and a Delaware District court proceeding against Petitioner involving the same technology (*Bradium Techs. LLC v. Microsoft Corp.*, 1:15-cv-00031-RGA).

4. Mr. Zachary has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R.

## 2. Conclusions

For the reasons stated above, Patent Owner respectfully submits that there is good cause for the Board to recognize Michael N. Zachary *pro hac vice* during the proceeding.

Dated: February 1, 2016

/Michelle Carniaux /  
KENYON & KENYON LLP  
One Broadway  
New York, NY 10004-1007  
Tel.: (212) 425-7200

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing “MOTION FOR *PRO HAC VICE* ADMISSION OF MICHAEL N. ZACHARY” was served via electronic mail on February 1, 2016, on the Petitioner at the correspondence address of the Petitioner as follows:

Bing Ai  
Matthew Bernstein  
Vinay Sathe  
Patrick McKeever  
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/Michelle Carniaux /  
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# EXHIBIT A

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