#### UNITED STATES PATENT AND TRADEMARK OFFICE

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#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Twilio Inc.
Petitioner

V.

Telesign Corporation Patent Owner

\_\_\_\_

Case IPR2016-00450 Patent No. 8,462,920

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Before SALLY C. MEDLEY, JUSTIN T. ARBES, and KIMBERLY McGRAW, *Administrative Patent Judges*.

## MOTION FOR SARAH J. GUSKE TO APPEAR PRO HAC VICE ON BEHALF OF PETITIONER



Petitioner respectfully requests that the Board recognize Ms. Guske as counsel *pro hac vice* during this proceeding.

#### I. BACKGROUND

Petitioner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the "Order – Authorization Motion for *Pro Hac Vice* Admission" in Case No. IPR2013-00639 ["the Order"].

#### II. STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Ms. Guske *pro hac vice*.

Ms. Guske is an experienced litigation attorney and has been involved in numerous complex litigations in state and federal courts. Ms. Guske's biography is attached hereto as **Exhibit A**.

Ms. Guske has reviewed U.S. Patent No. 8,462,920 and the petition, already filed in this proceeding. Further, Ms. Guske is counsel of record in the co-pending litigation between the parties, *Telesign Corp. v. Twilio Inc.*, No. 2:15-cv-03240-PSG (C.D. Cal), and *Telesign Corp. v. Twilio Inc.*, No. 2:16-cv-02106-PSG (C.D. Cal), and as such, is familiar with the subject matter at issue in this proceeding.



Case IPR2016-00450 U.S. Patent No. 8,462,920

Patent Owner was consulted through its counsel on October 3, 2016 and Patent Owner stated that they do not oppose this motion.

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Ms. Guske as counsel *pro hac vice* during this proceeding.

## III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioner's Motion for Pro Hac Vice Admission is accompanied by an Affidavit of Ms. Sarah Guske as required by the Order, attached hereto as **Exhibit B**.

October 5, 2016

BAKER BOTTS L.L.P. ATTN: Wayne O. Stacy 2001 Ross Ave., #800 Dallas, TX 75201

Tel: (214) 953-6678 Fax: (214) 661-4678 Respectfully submitted, BAKER BOTTS L.L.P.

/Wayne O. Stacy/
Wayne Stacy
Reg. No. 45,125
Lead Counsel



# **EXHIBIT A**



## BAKER BOTTS

## Sarah J. Guske



#### **PARTNER**

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#### **EDUCATION AND HONORS**

J.D., University of California, Davis School of Law, 2004

B.S., Electrical Engineering, Washington State University, 2001 summa cum laude

B.A., Physics, Whitworth University, 2001 *summa cum laude* 

Recognized as a *Super Lawyer-Rising Star* (Thomson Reuters), 2014

Recognized as an "Associate to Watch," *Chambers USA*, 2012

Sarah Guske is a partner in the firm's Intellectual Property group with twelve years of experience litigating software and electronics patent litigation cases. She has litigated matters in district court and before the PTAB involving a wide variety of technologies, including telecommunication protocols and systems, MPEG Multimedia data for broadcast, telephonic voice recognition software and graphic chipset design. Ms. Guske also has significant appellate experience, and has served as an Adjunct Professor teaching patent litigation.

#### **Representative Litigation Cases:**

**Interactive Systems Worldwide, Inc. v. Mikohn Gaming Corp. et al. (District of Nevada)** - litigation counsel to Mikohn Gaming Corp. and STB Holdings, Inc. in patent litigation related to real-time sports betting technologies,

Zenith Electronics v. Thomson, Philips Electronics, TTE Technology, Pioneer Electronics (Eastern District of Texas) - litigation counsel to Zenith in patent litigation over patents essential for compliance with ATSC Digital Television Standard.

Bookham, Inc. v. Unaxis Balzers AG et al. (Northern District of California) - litigation counsel to Bookham in patent litigation related to color wheel technology,

**HyperRoll Israel, Ltd. v. Hyperion Solutions (Eastern District of Texas)** - litigation counsel to HyperRoll Israel, Ltd. in a patent litigation against Hyperion Solutions, The technology in this case involves database-management software.

**HyperRoll, Inc. v. Hyperion Solutions (Northern District of California)** - litigation counsel to HyperRoll, Inc. in a declaratory judgment action brought by Hyperion Solutions. The technology in this case involves database-management software.

**Qualcomm Incorporated v. Nokia Corporation (Eastern District of Texas)** - litigation counsel for Qualcomm in a patent infringement action involving cellular telephony systems and mobile TV applications.



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