

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WHATSAPP INC.
Petitioner

v.

TRIPLAY INC.
Patent Owner

Case IPR2016-00717
U.S. Patent No. 8,874,677

**PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION
UNDER 37 C.F.R. § 41.10(c)**

Petitioner WhatsApp Inc. respectfully requests that the Board recognize Yuan Liang, Esq., 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—Authorizing Motion for *Pro Hac Vice* Admission" in Case No. IPR2013-00639 (MPT) ["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 Mr. Liang *pro hac vice*.

Mr. Liang is an experienced litigation attorney and has been involved in various complex litigations in federal courts. Mr. Liang's biography is attached hereto as Exhibit 1026 to this Motion.

Mr. Liang has studied and reviewed U.S. Patent No. 8,874,677, its prosecution history, the prior art to the '677 patent, and the petition filed in this proceeding. Mr. Liang was also involved in the drafting and review of the IPR petition herein. Further, Mr. Liang is familiar with the pending litigation between the parties pending before the U.S. District Court for Delaware entitled *Triplay, Inc. et al. v. WhatsApp Inc.*, Case No. 1:13-cv-01703-LPS; and, as such, is familiar with the subject matter at issue in this proceeding. Based on his professional experience and his particular experience with the '677 patent, Mr. Liang is familiar

with the subject matter at issue in this proceeding.

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Mr. Liang 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 a Declaration of Yuan Liang attached hereto as Exhibit 1027 as required by the Order.

Dated: February 6, 2017

Respectfully submitted,

COOLEY LLP
ATTN: Patent Group
1299 Pennsylvania Ave., NW, Suite 700
Washington, DC 20004
Tel: (650) 843-5001
Fax: (650) 849-7400

By: /Heidi L. Keefe/
Heidi L. Keefe
Reg. No. 40,673
Counsel for Petitioner
WhatsApp Inc.

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION (Yuan Liang)** and related documents, are being served via electronic mail on the 6th day of February, 2017, upon counsel of record for the Patent Owner as follows:

Barry Schindler
SchindlerB@gtlaw.com
Greenberg Traurig LLP
njdocket@gtlaw.com

Jeremy J. Monaldo
Fish & Richardson PC
monaldo@fr.com

DATED: February 6, 2017

/ Heidi L. Keefe /
Heidi L. Keefe
Reg. No. 40,673

COOLEY LLP
Attn: Patent Docketing
1299 Pennsylvania Ave. NW, Suite 700
Washington, D.C. 20004
Tel: (650) 843-5001
Fax: (650) 849-7400