

Filed on behalf of TQ Delta LLC

By: Peter J. McAndrews

McAndrews, Held & Malloy, Ltd.

500 W. Madison St., 34th Floor

Chicago, IL 60661

Tel: 312-775-8000

Fax: 312-775-8100

E-mail: pmcandrews@mcandrews-ip.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

TQ DELTA, LLC,
Patent Owner.

Case IPR2016-01009
Patent No. 8,238,412 B2

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

Patent Owner TQ Delta LLC, respectfully requests that the Board recognize Rajendra A. Chiplunkar, Esq., as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Patent Owner'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. Chiplunkar *pro hac vice*.

Mr. Chiplunkar is an experienced litigation attorney and has been involved in numerous complex litigations in federal courts. Mr. Chiplunkar's biography is attached hereto as Exhibit 2007 to this Motion.

Mr. Chiplunkar has reviewed U.S. Patent No. 8,238,412, and the papers already filed in this proceeding. Further, Mr. Chiplunkar is familiar with the pending litigations between the parties pending before the United States District Court, District of Delaware, entitled *TQ Delta LLC v. Comcast Cable Communications LLC*, Case No. 1:15-cv-00611; *TQ Delta LLC v. CoxCom, et al.*, Case No. 1:15-00612; *TQ Delta LLC v. DirecTV, et al.*, Case No. 1:15-cv-00613; *TQ Delta LLC v. DISH Network Corporation, et al.*, Case No. 1:15-cv-00614; *TQ Delta LLC v. Time Warner Cable, et al.*, Case No. 1:15-cv-00615; *TQ Delta LLC*

v. Verizon Services Corp., Case No. 1:15-00616; *Adtran Inc. v. TQ Delta LLC*, Case No. 1:15-cv-00121; *TQ Delta LLC v. ADTRAN*, Case No. 1:14-cv-00954; *ADTRAN v. TQ Delta LLC*, Case No. 5:14-cv-01381 (ALND transferred to DE); *TQ Delta LLC v. ZyXEL Communications Corp.*, Case No. 1:13-cv-02013; *TQ Delta LLC v. 2Wire, Inc.*, Case No. 1:13-cv-01835; *TQ Delta LLC v. Zhone Techs. Inc.*, Case No. 1:13-cv-01836; and, as such, is familiar with the subject matter at issue in this proceeding.

Petitioner does not oppose this motion for admission *pro hac vice* of Mr. Chiplunkar.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Chiplunkar as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Motion for Pro Hac Vice Admission is accompanied by a Declaration of Rajendra A. Chiplunkar attached hereto as Exhibit 2008 as required by the Order.

Respectfully submitted,

Dated: June 13, 2017

/Peter J. McAndrews/

Peter J. McAndrews

Registration No. 38,547

McANDREWS, HELD & MALLOY, LTD.

500 West Madison Street, 34th Floor

Chicago, Illinois 60661

Office: (312) 775-8000

Fax: (312) 775-8100

pmcandrews@mcandrews-ip.com

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PATENT OWNER’S MOTION FOR PRO HAC VICE ADMISSION (Rajendra A. Chiplunkar)** and related documents, are being served via electronic mail on this 13th day of June, 2017, by electronic mail to the following:

Lead Counsel	Back-up Counsel
David L. McCombs HAYNES & BOONE, LLP 2323 Victory Ave., Suite 700 Dallas, TX 75219 Tel. 214-651-5533 Fax 214-200-0853 david.mccombs.ipr@haynesboone.com	Theodore M. Foster Tel. 972-739-8649 Gregory P. Huh Tel. 972-739-6939 Russell Emerson Tel. 214-651-5328 HAYNES & BOONE, LLP 2323 Victory Ave., Suite 700 Dallas, TX 75219 Fax 972-692-9156 ipr.theo.foster@haynesboone.com gregory.huh.ipr@haynesboone.com russell.emerson.ipr@haynesboone.com

Dated: June 13, 2017

/Peter J. McAndrews/

Peter J. McAndrews
Registration No. 38,547
McANDREWS, HELD & MALLOY,
LTD.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
Telephone: (312) 775-8000