

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RUBICON COMMUNICATIONS, LP  
Petitioner,

v.

LEGO A/S  
Patent Owner.

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Case IPR2016-01187  
Patent 8,894,066

**PATENT OWNER'S MOTION FOR *PRO HAC VICE*  
ADMISSION OF ELIZABETH A. ALQUIST  
UNDER 37 C.F.R. § 42.10**

### **Precise Relief Requested**

The Patent Owner LEGO A/S (“LEGO”) respectfully requests under 37 C.F.R. § 42.10(c) that the Board recognize Elizabeth A. Alquist as counsel *pro hac vice* in this proceeding. This motion is authorized by the Notice of Incomplete Petition entered on June 20, 2016.

### **Statement of Facts**

The Board may recognize counsel *pro hac vice* upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. 37 C.F.R. § 42.10(c) provides an example of “good cause,” where “counsel is an experienced litigation attorney and has an established familiarity with the subject matter at issue in the proceeding.”

For this proceeding, Lead Counsel, Brian R. Pollack, is a registered practitioner, having USPTO Registration No. 47,001. There is a good cause to grant this Motion, as Ms. Alquist is an experienced litigation attorney and has an established familiarity with the subject matter at issue in the proceeding. She is a litigation attorney with over 12 years of patent litigation experience. She is a member in good standing of the Bar of Connecticut. She has never been suspended, disbarred, sanctioned, denied admission to practice, or cited for contempt by any court or administrative body. She is familiar with the subject

matter at issue and she has represented the Patent Owner in several patent and copyright litigations. Above facts and other conditions for admissibility identified by the Board are listed in the accompanying Declaration of Elizabeth A. Alquist, Ex. 2001.

### **Conclusion**

For the foregoing reasons, Patent Owner respectfully submits that there is good cause for the Board to recognize Elizabeth A. Alquist as counsel *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: July 5, 2016

/ Brian R. Pollack /

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*Counsel for Patent Owner*

**Patent Owner's Exhibit List**

<b>Exhibit No.</b>	<b>Exhibit Description</b>
2001	Declaration of Elizabeth A. Alquist

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