

Case IPR2016-01263
U.S. Patent No. 8,155,298 B2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BRIGHT HOUSE NETWORKS, LLC,
WIDEPENWEST FINANCE, LLC,
KNOLOGY OF FLORIDA, INC.,
BIRCH COMMUNICATIONS, INC.,
Petitioners

v.

FOCAL IP, LLC,
Patent Owner

Case IPR2016-01263
Patent No. 8,155,298 B2

Before SALLY C. MEDLEY, JONI Y. CHANG, and BARBARA A. PARVIS,
Administrative Patent Judges.

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

Petitioner Bright House Networks, LLC (“Bright House”) respectfully requests that the Board recognize Ms. Guske as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

On October 26, 2016, Petitioner Bright House filed a Motion for *Pro Hac Vice* Admission of Sarah J. Guske. On November 14, 2016, the Board dismissed the Motion without prejudice and authorized Bright House to file a motion correcting the deficiencies noted in the Board’s Order. Paper 22. Accordingly, Bright House’s Corrected 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, Paper 7 [“the Order”], and IPR2016-01263, Paper 22.

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 1057**.

Ms. Guske has reviewed U.S. Patent No. 8,155,298 B2 and the petition, already filed in this proceeding. Further, Ms. Guske is counsel of record in the related co-pending litigation between the parties, *Patent Asset Licensing, LLC v. Bright House Networks, LLC*, No. 3:15-cv-00742-TJC (M.D. Fla.) and, as such, is familiar with the subject matter at issue in this proceeding.

Focal IP, LLC (“Focal IP”) was consulted through its counsel in correspondence dated October 3, 2016. Focal IP stated that they would not oppose this motion.

Therefore, Bright House 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

Bright House’s Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Ms. Sarah Guske as required by the Order and is attached hereto as **Exhibit 1056**.

November 15, 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

Case IPR2016-01263
U.S. Patent No. 8,155,298 B2

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on November 15, 2016, the foregoing was served electronically via email on the following:

Brent N. Bumgardner
brent@nelbum.com
PAL-IPR@nelbum.com

John Murphy
murphy@nelbum.com

NELSON BUMGARDNER, P.C.
3131 W. 7th Street, Suite 300
Fort Worth, Texas 76107

By: /Wayne Stacy/
Wayne Stacy
Reg. No. 45,125
Lead Counsel