

Filed on behalf of Securus Technologies, Inc.

By: Justin B. Kimble (JKimble-IPR@bcpc-law.com)
Jeffrey R. Bragalone (jbragalone@bcpc-law.com)
Daniel F. Olejko (dolejko@bcpc-law.com)
Nicholas C. Kliewer (nkliewer@bcpc-law.com)
Bragalone Conroy PC
2200 Ross Ave.
Suite 4500 West
Dallas, TX 75201
Tel: 214.785.6670
Fax: 214.786.6680

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION,
Petitioner,
v.
SECURUS TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2016-01362
U.S. Patent No. 9,083,850

***PRO HAC VICE MOTION TO ADMIT ATTORNEY
DANIEL F. OLEJKO PURSUANT TO 37 C.F.R. § 42.10(c)***

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

Patent Owner Securus Technologies, Inc. (“Securus”) hereby files this motion pursuant to 37 C.F.R. § 42.10(c) for Daniel F. Olejko to appear *pro hac vice* on its behalf before the Patent Trial and Appeal Board in IPR2016-001362. This Motion follows the guidelines set forth in IPR2013-00639, Paper 7, entered October 15, 2013.

I. Factual Background

Securus has already designated a registered practitioner, Justin B. Kimble (Reg. No. 58,591) as lead counsel, and Securus intends to designate Mr. Olejko as one of its back-up counsel in the event this motion is granted. The following statement of facts shows that there is good cause for the Board to recognize Mr. Olejko *pro hac vice* during this proceeding.

Mr. Olejko is a patent litigator with over nine years’ experience, including significant experience in the area of patent validity and invalidity. In the many patent litigations in which he has been counsel, he has worked extensively on issues relating to 35 U.S.C. §§ 101, 102, 103, and 112, including by reviewing and analyzing numerous prosecution histories and prior art references, developing arguments for contentions and briefing for motions to dismiss, summary judgment motions, post-trial motions, and appeals, working closely with experts on their reports, conducting discovery and expert depositions, and preparing arguments for

trial. Mr. Olejko has also spent significant time learning the procedure of *inter partes* review proceedings.

Mr. Olejko currently represents Securus in a number of pending appeals before the U.S. Court of Appeals for the Federal Circuit, which are all appeals from final written decisions in *inter partes* review proceedings before the Board. *See, e.g., Securus Techs., Inc. v. Global Tel*Link Corp.*, Nos. 2016-1992, -1993 (Fed. Cir. docketed May 4, 2016) (appealing from IPR2014-01278 and IPR2014-01282, involving U.S. Patent No. 7,860,222); *Global Tel*Link Corp. v. Securus Techs., Inc.*, No. 16-2573 (Fed. Cir. docketed May 26, 2016) (appealing from IPR2015-00156, involving U.S. Patent No. 7,551,732); *Securus Techs., Inc. v. Global Tel*Link Corp.*, No. 16-2573 (Fed. Cir. docketed Aug. 29, 2016) (appealing from IPR2015-00155, involving U.S. Patent No. 7,853,243). As counsel for Securus, Mr. Olejko has become very familiar with patents that cover technology that is similar to the technology at issue in this proceeding (e.g., prison telephone systems). Further, Mr. Olejko spent significant time assisting in the development of arguments in support of the responses in this matter, as well as considerable time preparing and reviewing the Patent Owner's Preliminary Response and Patent Owner's Response itself.

Given Mr. Olejko's familiarity with the underlying technology, patent at issue, and prior art, Securus asks that the Board grant this Motion to afford Securus the benefit of having an additional attorney authorized on this matter.

II. Attestation of Facts by Mr. Olejko

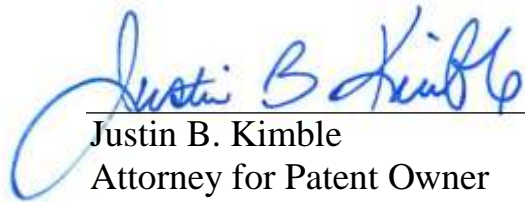
Mr. Olejko has submitted a declaration herewith attesting to the following facts:

- Mr. Olejko is a member in good standing of the Pennsylvania State Bar.
- Mr. Olejko has never been subject to any suspensions or disbarments from practice before any court or administrative body.
- None of Mr. Olejko's applications for admission to practice before any court or administrative body has ever been denied.
- Mr. Olejko has never been sanctioned nor had contempt citations imposed by any court or administrative body.
- Mr. Olejko has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R. pt. 42.
- Mr. Olejko will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. § 11.101, *et seq.*, and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

- This is Mr. Olejko's third application to appear *pro hac vice* in a proceeding before the Board. The applications in IPR2016-01123 and IPR2016-01220 were granted.
- Mr. Olejko has familiarity with the subject matter at issue in this proceeding as set forth in Section I above.

Dated: May 12, 2017

Respectfully submitted,



Justin B. Kimble
Attorney for Patent Owner
Registration No. 58,591
Bragalone Conroy PC
2200 Ross Avenue, Suite 4500W
Dallas, TX 75201
Phone: (214) 785-6670
Email: JKimble-IPR@bcpc-law.com

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