

Petitioner's Motion for *Pro Hac Vice* Admission of Rose Cordero Prey  
Case IPR2016-01561

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner,

v.

LIMESTONE MEMORY SYSTEMS LLC,  
Patent Owner.

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Case IPR2016-01561  
Patent 6,233,181

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APPLE INC.'S MOTION FOR *PRO HAC VICE* ADMISSION OF  
ROSE CORDERO PREY UNDER 37 C.F.R. § 42.10(c)

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450  
*Submitted Electronically via PTAB E2E*

### TABLE OF EXHIBITS

<b>Exhibit #</b>	<b>Exhibit Description</b>
1001	Declaration of Dr. Pinaki Mazumder
1002	Curriculum Vitae of Dr. Pinaki Mazumder
1003	U.S. Patent No. 6,233,181
1004	File History for U.S. Patent No. 6,233,181
1005	U.S. Patent No. 5,487,040 to Sukegawa
1006	U.S. Patent No. 5,267,214 to Fujishima
1007	U.S. Patent No. 4,967,397 to Walck
1008	U.S. Patent No. 5,956,285 to Watanabe
1009	Masashi Horiguchi et al., <i>A Flexible Redundancy Technique for High-Density DRAM's</i> , IEEE JOURNAL OF SOLID-STATE CIRCUITS, VOL. 26, NO. 1, Jan. 1991, at 12-17
1010	Kazutami Arimoto et al., <i>A 60-ns 3.3-V-Only 16 Mbit DRAM with Multipurpose Register</i> , IEEE JOURNAL OF SOLID-STATE CIRCUITS, VOL. 24, NO. 5, Oct. 1989, at 1184-90
1011	U.S. Patent No. 5,687,123 to Hidaka
1012	U.S. Patent No. 5,726,946 to Yamagata
1013	U.S. Patent No. 6,003,148 to Yamauchi
1014	U.S. Patent No. 6,075,743 to Barth
1015	<i>Inter Partes</i> Review No. IPR2016-00096, Decision Granting Institution filed April 21, 2016
1016	<i>Inter Partes</i> Review No. IPR2016-00096, Judgment Granting Request for Adverse Judgment filed August 3, 2016

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1017	Affidavit of Michael N. Zachary in support of Motion for <i>Pro Hac Vice</i> Admission
1018	Affidavit of Rose Cordero Prey in support of Motion for <i>Pro Hac Vice</i> Admission

## **I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(c), and as authorized in the Board's Notice of Filing Date Accorded to Petition issued August 25, 2016 (Paper 3), Petitioner Apple Inc. respectfully requests the *pro hac vice* admission of Rose Cordero Prey to serve as back-up counsel for Petitioner in this proceeding.

## **II. GOVERNING LAWS, RULES, AND PRECEDENT**

Section 42.10(c) of 37 C.F.R. states as follows:

The Board may recognize counsel *pro hac vice* during a proceeding 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. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

Pursuant to the Board's August 25, 2016 Notice of Filing Date Accorded to Petition (Paper 3), the parties are authorized to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c) in accordance with the guidance specified in the "Order -- Authorizing Motion for *Pro Hac Vice* Admission" entered in Case

IPR2013-000639, Paper 7. According to that guidance, *pro hac vice* motions can be filed “no sooner than twenty one (21) days after service of the petition.”

IPR2013-000639, Paper 7 at 2.

### III. STATEMENT OF FACTS

Based on the following facts, and supported by the affidavit of Ms. Prey (Ex. 1018) submitted herewith, Petitioner requests the *pro hac vice* admission of Rose Cordero Prey in this proceeding.

1. Petitioner’s lead counsel, John R. Hutchins, is a registered practitioner (Reg. No. 43,686), and a partner at the law firm of Andrews Kurth Kenyon LLP.
2. Ms. Prey is a partner at the law firm of Andrews Kurth Kenyon LLP. Ex. 1018, ¶ 3.
3. Ms. Prey is an experienced litigation attorney. Ms. Prey has been litigating patent cases for over 10 years, and has experience litigating patent infringement cases in many district courts and before the U.S. International Trade Commission. *Id.* at ¶ 4. Among her experience in patent litigation matters, Ms. Prey has been counsel at trial, hearings, and with respect to patent-related summary judgment proceedings and other patent-related hearings and

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