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 IPR2016-01567
Patent 5,894,441

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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)

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TABLE OF EXHIBITS

Exhibit #	Exhibit Description
1001	Declaration of Dr. Pinaki Mazumder
1002	Curriculum Vitae of Dr. Pinaki Mazumder
1003	U.S. Patent No. 5,894,441
1004	File History for U.S. Patent No. 5,894,441
1005	U.S. Patent No. 5,265,055 to Horiguchi
1006	U.S. Patent No. 5,126,973 to Gallia
1007	*Inter Partes* Review No. IPR2016-00094, Petition for *Inter Partes* Review filed October 27, 2015 (without exhibits)
1008	U.S. Patent No. 5,270,975 to McAdams
1009	Japanese Patent Appl. No. H06-052696 to Minami
1010	*Inter Partes* Review No. IPR2016-00094, Patent Owner's Preliminary Response filed January 27, 2016
1011	*Inter Partes* Review No. IPR2016-00094, Decision Denying Institution filed April 12, 2016
1012	U.S. Patent No. 5,956,285 to Watanabe
1013	Masashi Horiguchi et al., *A Flexible Redundancy Technique for High-Density DRAMs*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. 26, No. 1, Jan. 1991, at 12-17
1014	U.S. Patent No. 5,267,214 to Fujishima
1015	U.S. Patent No. 5,349,556 to Lee
1016	U.S. Patent No. 5,355,339 to Oh
1017	U.S. Patent No. 5,359,560 to Suh

1018	U.S. Patent No. 5,798,974 to Yamagata
1019	U.S. Patent No. 5,808,948 to Kim
1020	Masashi Horiguchi, *Redundancy Techniques for High-Density DRAMs*, INNOVATIVE SYSTEMS IN SILICON CONFERENCE, Oct. 1997, at 22-29
1021	Masashi Horiguchi et al., NANOSCALE MEMORY REPAIR (Springer 2011)
1022	Robert T. Smith et al., *Laser Programmable Redundancy and Yield Improvement in a 64 K DRAM*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, VOL. SC-16, NO. 5, Oct. 1981, at 506-14
1023	Affidavit of Michael N. Zachary in support of Motion for *Pro Hac Vice* Admission
1024	Affidavit of Rose Cordero Prey in support of Motion for *Pro Hac Vice* 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 September 1, 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 September 1, 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. 1024) 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. 1024, ¶ 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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