

Filed on behalf of TQ Delta LLC
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

TQ DELTA, LLC,
Patent Owner.

Case IPR2016-01760
Patent No. 9,094,268

PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION
UNDER 37 C.F.R. § 41.10(c)

Patent Owner TQ Delta LLC, respectfully requests that the Board recognize Rajendra A. Chiplunkar, Esq., as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Patent Owner's 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 (MPT) ["the Order"].

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 Mr. Chiplunkar *pro hac vice*.

Mr. Chiplunkar is an experienced litigation attorney and has been involved in numerous complex litigations in federal courts. Mr. Chiplunkar's biography is attached hereto as Exhibit 2012 to this Motion.

Mr. Chiplunkar has reviewed U.S. Patent No. 9,094,268 and the papers already filed in this proceeding. Further, Mr. Chiplunkar is familiar with the litigations pending before the United States District Court, District of Delaware, entitled *TQ Delta LLC v. Comcast Cable Communications LLC*, Case No. 1:15-cv-00611; *TQ Delta LLC v. CoxCom, et al.*, Case No. 1:15-00612; *TQ Delta LLC v. DirecTV, et al.*, Case No. 1:15-cv-00613; *TQ Delta LLC v. DISH Network Corporation, et al.*, Case No. 1:15-cv-00614; *TQ Delta LLC v. Time Warner Cable, et al.*, Case No. 1:15-cv-00615; *TQ Delta LLC v. Verizon Services Corp.*,

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Case No. 1:15-00616; *Adtran Inc. v. TQ Delta LLC*, Case No. 1:15-cv-00121; *TQ Delta LLC v. ADTRAN*, Case No. 1:14-cv-00954; *ADTRAN v. TQ Delta LLC*, Case No. 5:14-cv-01381 (ALND transferred to DE); *TQ Delta LLC v. ZyXEL Communications Corp.*, Case No. 1:13-cv-02013; *TQ Delta LLC v. 2Wire, Inc.*, Case No. 1:13-cv-01835; *TQ Delta LLC v. Zhone Techs. Inc.*, Case No. 1:13-cv-01836; and, as such, is familiar with the subject matter at issue in this proceeding.

Petitioner does not oppose this motion for admission *pro hac vice* of Mr. Chiplunkar.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Chiplunkar as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Motion for Pro Hac Vice Admission is accompanied by a Declaration of Rajendra A. Chiplunkar attached hereto as Exhibit 2013 as required by the Order.

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Respectfully submitted,

Dated: September 8, 2017

/Peter J. McAndrews/
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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION (Rajendra A. Chiplunkar)** and related documents, are being served via electronic mail on this 8th day of September, 2017, by electronic mail to the following:

Lead Counsel	Back-up Counsel
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