

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DELL INC., EMC CORPORATION, HEWLETT-PACKARD  
ENTERPRISE CO., AND HP ENTERPRISE SERVICES, LLC,  
Petitioner

v.

REALTIME DATA LLC  
Patent Owner

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Case IPR2017-00176  
Patent 7,161,506

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**MOTION FOR ADMISSION *PRO HAC VICE* OF  
KAYVAN B. NOROOZI**

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

## **I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Realtime Data LLC (“Realtime”) respectfully requests that the Patent Trial and Appeal Board admit Kayvan B. Noroozi *pro hac vice* in this proceeding, IPR2017-00176. Petitioner has indicated it will not oppose this motion.

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

Section 42.10(c) provides that “where 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 a showing that counsel is an experienced litigating attorney and has established familiarity with the subject matter at issue in the proceeding.”

## **III. STATEMENT OF FACTS**

The facts here satisfy § 42.10(c) and demonstrate good cause for the Board to recognize Mr. Noroozi *pro hac vice* in this proceeding.

Lead counsel, Jason Eisenberg, is a registered practitioner. Counsel, Kayvan B. Noroozi, is an experienced patent litigator in good standing with the California State Bar and admitted to practice before the United States District Courts for the Eastern District of Texas and Northern District of California. (Noroozi Decl., ¶¶ 1-2.) Mr. Noroozi is also familiar with the subject matter at issue in this proceeding through his review of the underlying patent, the record, and discussions with Patent

Owner, its counsel, and its expert witness. (*Id.*, ¶ 8.) Mr. Noroozi understands and accepts that he 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). (*Id.*, ¶ 7.)

## V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Kayvan B. Noroozi *pro hac vice* in this proceeding.

Respectfully submitted,  
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Jason D. Eisenberg/

Jason D. Eisenberg, Registration No. 43,447  
Counsel for Patent Owner

Date: February 24, 2017

1100 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 371-2600

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **MOTION FOR  
ADMISSION PRO HAC VICE OF KAYVAN B. NOROOZI** was served  
electronically via e-mail on February 24, 2017 in its entirety on the following  
counsel of record for Petitioner:

Andrew R. Sommer (Lead Counsel)  
Thomas M. Dunham (Back-up Counsel)  
Garth A. Winn (Back-up Counsel)  
Vivek V. Krishnan (Back-up Counsel)  
WINSTON & STRAWN LLP  
[IPR2017-00176@winston.com](mailto:IPR2017-00176@winston.com)  
[garth.winn@klarquist.com](mailto:garth.winn@klarquist.com)

Respectfully submitted,  
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Jason D. Eisenberg/

Jason D. Eisenberg, Registration No. 43,447  
Counsel for Patent Owner

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