

Paper No. \_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY CORPORATION,  
Petitioner,

v.

FUJIFILM CORPORATION,  
Patent Owner.

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Case No. IPR2018-00876  
Patent No. 6,462,905

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**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*  
ADMISSION OF NATHAN R. SPEED**

## EXHIBITS

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Patent No. 6,462,905
1002	File History for U.S. Patent No. 6,462,905
1003	CV of Mr. Thomas W. von Alten
1004	Declaration of Mr. Thomas W. von Alten
1005	U.S. Patent No. 5,901,916 (“McAllister-I”)
1006	Japanese Patent Publication No. H11-273307 (“Mizutani”)
1007	European Patent Publication No. 0 284 687 A2 (“Laverriere”)
1008	U.S. Patent No. 5,927,633 (“McAllister-II”)
1009	File History for European Patent No. 1 098 320 B1
1010	Japanese Patent Publication No. S63-11776 (“Morita-I”)
1011	EP 0 926 676 A1 (“Morita-II”)
1012	Japanese Patent Publication No. H11-288571 (“Tsuyuki”)
1013	International Patent Publication No. WO 99/41513 (“Betzler”)
1014	Fujifilm Corp. and Fujifilm Recording Media U.S.A., Inc.’s Proposed Constructions in <i>Certain Magnetic Data Storage Tapes and Cartridges Containing the Same</i> , 337-TA-1076 (dated Jan. 18, 2018)
1015	Summary of Petitioner’s Proposed Claim Constructions
1016	Redline Comparison of Issued Claim 4 of U.S. Patent No. 6,462,905 and Original Claim 4 of EP 1 098 320 B1
1017	U.S. Patent No. 2,778,636
1018	Excerpt from FUNK & WAGNALLS NEW INTERNATIONAL DICTIONARY OF THE ENGLISH LANGUAGE (2000)
1019	Excerpt from THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE (2011)
1020	Excerpt from THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE (2011)
1021	Works, G., “CURVIC COUPLING DESIGN,” <i>Gear Technology</i>

	(November/December 1986)
1022	Excerpt from WEBSTER'S ENCYCLOPEDIA UNABRIDGED DICTIONARY OF THE ENGLISH LANGUAGE (1989)
1023	Excerpt from RANDOM HOUSE UNABRIDGED DICTIONARY (1993)
1024	U.S. Patent No. 1,660,792
1025	Claim Comparison of Original Claim 4 of EP 1 098 320 B1 and Amended Claim 1 of EP 1 098 320 B1
1026	Claim Element Comparison of Primary References
1027	Standard ECMA-120 (Dec. 1993)
1028	Standard ECMA-196 (Dec. 1993)
1029	European Patent No. 1 098 320 B1
1030	Declaration of Nathan R. Speed in Support of Motion for Admission <i>Pro Hac Vice</i>

## **I. STATEMENT OF PRECISE RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3, Sony Corporation (“Petitioner”) respectfully requests that the Patent Trial and Appeal Board admit Nathan R. Speed *pro hac vice* in this proceeding, IPR2018-00876. Petitioner is concurrently seeking admission of Mr. Speed *pro hac vice* in related case, IPR2018-00877. Patent Owner has been consulted and has indicated it does not object to Mr. Speed being admitted *pro hac vice* in this proceeding.

## **II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THE PROCEEDING**

In accordance with 37 C.F.R. § 42.10(c), 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 that the Board may impose. Section 42.10(c) indicates 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 an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize Mr. Speed *pro hac vice* in this proceeding.

*First*, as set forth in Mr. Speed's declaration (Ex-1030) at paragraphs H through J, Mr. Speed has familiarity with the subject matter at issue in these proceedings. He has worked on preparing and reviewing the materials submitted in this proceeding.

*Second*, Mr. Speed has extensive patent litigation experience and is expected to use his experience to support Lead Counsel during the proceedings, including during depositions. Good cause exists to have Petitioner appoint as counsel Mr. Speed, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Speed attests to all of the remaining matters set forth in Paper No. 7 from *Unified Patents v. Parallel Iron*, Case IPR2013-00639 (PTAB Oct. 15, 2013).

### III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding.

Respectfully submitted  
*Sony Corporation*

Date: July 23, 2018

/ Richard Giunta/

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