

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

UNIFIED PATENTS INC.,  
Petitioner,

v.

REALTIME ADAPTIVE STREAMING LLC,  
Patent Owner.

---

Case IPR2018-00883  
Patent No. 8,934,535

---

**UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF  
THOMAS C. CHEN**

## I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Realtime Adaptive Streaming LLC (“Realtime”) respectfully requests that the Patent Trial and Appeal Board admit Thomas C. Chen *pro hac vice* in this proceeding. Patent Owner has conferred with counsel for Petitioner Unified Patents Inc., and Petitioner does not oppose Realtime’s motion to allow Mr. Chen to appear *pro hac vice* in this matter.

## 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. Chen *pro hac vice* in this proceeding.

Lead counsel, William Rothwell, is a registered practitioner. Counsel, Thomas C. Chen, is an experienced patent litigator in good standing with the California State Bar and the District of Columbia Bar, admitted to practice before the Federal Circuit and the United States District Courts for the

MOTION FOR ADMISSION *PRO HAC VICE* OF THOMAS C. CHEN

Northern, Central, and Southern Districts of California, and has never been suspended, disbarred, sanctioned, cited for contempt of court, or had a court or administrative body deny his application for admission to practice. Ex. 2002 ¶¶ 1-5. Mr. Chen's declaration includes a list of the proceedings before the Office in which he has applied to appear *pro hac vice* in the last three years. *Id.* at ¶ 6. Mr. Chen has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37 of the Code of Federal Regulations. *Id.* at ¶ 7. Mr. Chen 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.* at ¶ 8. Mr. Chen is familiar with the subject matter at issue in this proceeding through his review of the record in this proceeding. *Id.* at ¶ 9.

#### IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Thomas C. Chen *pro hac vice* in this proceeding.

IPR2018-00883  
MOTION FOR ADMISSION *PRO HAC VICE* OF THOMAS C. CHEN

Respectfully submitted,

/s/ William Rothwell

William P. Rothwell, Reg. No. 72,522  
NOROOZI PC  
2245 Texas Drive, Suite 300  
Sugar Land, TX 77479

*Counsel for Patent Owner*

Date: August 14, 2018

**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that the foregoing **UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE OF THOMAS C. CHEN** was served electronically via e-mail on August 14, 2018, in its entirety on the following counsel of record for Petitioner:

Lionel Lavenue (Lead Counsel)	lionel.lavenue@finnegan.com
Ashraf Fawzy (Back-up Counsel)	afawzy@unifiedpatents.com
Jonathan Stroud (Back-up Counsel)	jonathan@unifiedpatents.com
C. Brandon Rash (Back-up Counsel)	brandon.rash@finnegan.com
James Stein (Back-up Counsel)	james.stein@finnegan.com
Service Email	UnifiedPatents-IPR2018-00883@finnegan.com

Respectfully submitted,

/s/ William Rothwell

William P. Rothwell, Reg. No. 72,522  
NOROOZI PC  
2245 Texas Drive, Suite 300  
Sugar Land, TX 77479

*Counsel for Patent Owner*

Date: August 14, 2018