

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner,

v.

BRADIUM TECHNOLOGIES LLC,
Patent Owner.

Case IPR2018-00952
Patent No. 9,253,239

**PATENT OWNER'S MOTION FOR *PRO HAC VICE*
ADMISSION OF MICHAEL N. ZACHARY UNDER
37 C.F.R. §42.10(c)**

Paper No. 9

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner respectfully requests the *pro hac vice* admission of Michael N. Zachary as backup counsel for Patent Owner in the current proceedings. A declaration made by Mr. Zachary in support of this motion is submitted herewith as Exhibit 2003.

1. Statement of Facts

1. Mr. Zachary is a litigation attorney experienced in patent cases, and is admitted to practice law in California, Oregon, and Washington State, as well as the following Federal Courts:

U.S. District Court for the Central District of California;

U.S. District Court for the Eastern District of California;

U.S. District Court for the Northern District of California;

U.S. District Court for the Southern District of California;

U.S. District Court for the District of Colorado;

U.S. District Court for the District of Oregon;

U.S. District Court for the Eastern District of Texas;

U.S. District Court for the Eastern District of Washington;

U.S. District Court for the Western District of Washington.

2. Mr. Zachary has not had any application denied for admission to practice, nor has he been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.
3. Mr. Zachary has an established familiarity with the subject matter at issue in this proceeding, having represented Patent Owner in a prior *inter partes* review proceeding IPR2016-01897 for the same patent that is at issue in this proceeding, U.S. Pat. 9,253,239. Mr. Zachary has also represented Patent Owner in prior *inter partes* review proceedings for related patents, including IPR2016-00448 (U.S. Pat. No. 7,908,343) and IPR2016-00449 (U.S. Pat. 8,924,506), among others, and in prior litigation (now concluded) regarding the patent involved in this *inter partes* review proceeding as well as related patents.
4. Mr. Zachary 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 the C.F.R.

2. Conclusions

For the reasons stated above, Patent Owner respectfully submits that there is good cause for the Board to recognize Michael N. Zachary *pro hac vice* during the proceeding.

Dated: August 8, 2018

/s/ Chris J. Coulson

Chris J. Coulson (Reg. No. 61,771)

Lead Counsel for Patent Owner

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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2018, I caused a true and correct copy of the foregoing motion for *Pro Hac Vice* admission of Michael N. Zachary to be served via electronic mail to the attorneys of record at the following email addresses:

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