

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

QUALCOMM INCORPORATED,
Patent Owner

Case IPR2018-01281
Patent 8,768,865

PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*

ADMISSION OF NOAH C. GRAUBART

UNDER 37 C.F.R. § 42.10(c)

PETITIONER’S UPDATED EXHIBIT LIST

- APPLE-1001 U.S. Patent No. 8,768,865 to Narayanan, et al. (“the ‘865 patent”)
- APPLE-1002 Excerpts from the Prosecution History of the ‘865 Patent (“the Prosecution History”)
- APPLE-1003 Declaration of Dr. James Allen
- APPLE-1004 Curriculum Vitae of Dr. James Allen
- APPLE-1005 Wang et al, “*A Framework of Energy Efficient Mobile Sensing for Automatic User State Recognition*”, Proceedings of the 7th international conference on Mobile systems, applications, and services, pp. 179-192 , Kraków, Poland — June 22 - 25, 2009 (“Wang”)
- APPLE-1006 “Qualcomm Incorporated Compliant for Patent Infringement,” filed on November 29th, 2017, from Case No. 3:17-cv-02402-WQH-MDD filed in S.D. CA. (“Compliant”)
- APPLE-1007 Exhibit 865 of “Qualcomm Inc.’s Patent Initial Infringement Contentions,” filed on March 2nd, 2018, from Case No. 3:17-cv-02402-WQH-MDD filed in S.D. CA. (“Infringement Contentions”)
- APPLE-1008 U.S. Patent Application Publication No. 2010/0217533 to Nadkarni et al. (“Nadkarni”)
- APPLE-1009 U.S. Patent Application Publication No. 2008/0297513 to Greenhill et al. (“Greenhill”)
- APPLE-1010 Webpage of “Nokia N95 8GB - Full phone specifications” (Archive.org version dated 05/26/2009,

http://web.archive.org/web/20090526054459/http://www.gsmarena.com:80/nokia_n95_8gb-2088.php (“Nokia N95”)

- APPLE-1011 U.S. Patent No. US 8,676,224 to Louch (“Louch”)
- APPLE-1012 U.S. Patent Application Publication No. 2011/0066383 to Jangle et al. (“Jangle”)
- APPLE-1013 U.S. Patent No. 9575776 to De Andrade Cajahyba et al. (“De Andrade Cajahyba”)
- APPLE-1014 U.S. Patent Application Publication No. 2011/0081634 to Kurata (“Kurata”)
- APPLE-1015 Declaration of Mr. Chris Butler for Nokia N95/APPLE-1010
- APPLE-1016 Declaration of Mr. Scott Delman for Wang/APPLE-1005
- APPLE-1017 Cohn, D., Caruana, R., & McCallum, A. *Semi-supervised clustering with user feedback in Constrained Clustering: Advances in Algorithms, Theory, and Applications*, 4(1), 17-32 (2009). (“Cohn”)
- APPLE-1018 Ruzzelli, A., Nicolas, C. Schoofs, A., O’Hare, G. Real-time recognition and profiling of appliances through a single electricity sensor, Proc. 7th Annual IEEE Conference on Sensor Mesh (SECON), Boston. MA 2010. (“Ruzzelli”)
- APPLE-1019 Cilla, R., Particio, M., Garcia, J., Berlanga, A., and Molina, J. Recognizing Human Activities from Sensors Using Hidden Markov Models Constructed by Feature Selection, *Algorithms 2009*, 2: pp282-300. (“Cilla”)
- APPLE-1020 The Seventh Edition of the Authoritative Dictionary of IEEE Standards Terms (2000)
- APPLE-1021 RESERVED

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APPLE-1022 Declaration of Noah C. Graubart

Served, not filed:

Declaration of Dr. James Allen

Declaration of Mr. Jacob Robert Munford

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Pursuant to 37 C.F.R. § 42.10(c), Petitioner, Apple Inc. (“Petitioner” or “Apple”) respectfully requests that the Board recognize Noah C. Graubart as counsel *pro hac vice* in this proceeding. Petitioner seeks the counsel of Mr. Graubart due to his experience in representing Apple in other patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on September 6, 2018.

Patent Owner does not oppose this motion.

Statement of Facts

Mr. Graubart is a patent litigation attorney with over 15 years of experience representing clients in cases involving smartphone software, audio and video processing, telecommunications solutions, wireless networking, optical networking, computer hardware interfaces, and semiconductor fabrication methods. Mr. Graubart regularly litigates patent cases before the U.S. District Courts across the country, at the U.S. International Trade Commission, as well as arguing or briefing cases in the U.S. Courts of Appeals, including at the Federal Circuit. Through his practice in such cases, Mr. Graubart has gained substantial experience in all aspects of patent infringement litigation and other areas of intellectual property. Mr. Graubart began his legal career as a clerk for the

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