

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

REALTIME ADAPTIVE STREAMING LLC
Patent Owner.

Case IPR2019-01035
Patent 9,769,477

**PATENT OWNER'S MOTION
FOR PRO HAC VICE ADMISSION**

Patent Owner, Realtime Adaptive Streaming LLC hereby requests the Board recognize James S. Tsuei as counsel *pro hac vice* for this proceeding under 37 C.F.R. § 42.10(c). Petitioner does not oppose this motion.

I. STATEMENT OF FACTS

As required by § 42.10(c), the following statement of facts demonstrates that there is good cause for the Board to recognize Mr. Tsuei *pro hac vice*.

Mr. Tsuei is an experienced patent litigation attorney. Mr. Tsuei has practiced patent litigation since 2012. Mr. Tsuei is an Associate at the firm of Russ August & Kabat. Mr. Tsuei has experience litigating numerous patent infringement litigation matter before U.S. district courts. U.S. Patent No. 9,769,477 was asserted by Patent Owner in a co-pending litigation against Petitioner Google LLC, *Realtime Adaptive Streaming LLC, v. Google LLC*, Case No. 2:18-cv-03629-GW-JC (C.D. Cal., Filed April 30, 2018). Mr. Tsuei is an attorney responsible for the representation of Patent Owner in that co-pending litigation. Through his role as an attorney in the co-pending litigation, Mr. Tsuei has an established familiarity with the subject matter at issue in this IPR proceeding. Mr. Tsuei has been heavily involved with issues such as Patent Owner's responses to Petitioner's invalidity defenses in that litigation, some of which overlap with the grounds presented in this IPR proceeding. Patent Owner has expended significant resources in the co-pending litigation with Mr. Tsuei, and it wishes to continue using him as counsel in this IPR proceeding.

Patent Owner has executed a Power of Attorney authorizing Mr. Tsuei to serve as backup counsel in this IPR proceeding. Counsel for Patent Owner has conferred with counsel for Petitioner regarding this motion, and counsel for Petitioner does not oppose this motion.

II. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for *Pro Hac Vice* admission is accompanied by the declaration of Mr. Tsuei, attached hereto, attesting to the facts required by the Board in *Unified Patents, Inc. v. Parallel Iron, LLC*, No. IPR2013-00639 (P.T.A.B. Oct. 15, 2013) (Paper 10).

Respectfully submitted,

Dated: February 3, 2020

/s/ Philip X. Wang

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on February 3, 2020, by filing this document through the Patent Trial and Appeal Board End to End system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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Dated: February 3, 2020, 2020

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