

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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EPIC GAMES, INC.,  
Petitioner,

v.

INGENIOSHARE, LLC,  
Patent Owner

**U.S. PATENT NO. 10,142,810**

Case IPR2022-00202

**PETITIONER'S MOTION FOR THE PRO HAC VICE ADMISSION OF  
LINDSEY Y. SHI**

**LIST OF PETITIONER'S UPDATED EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>
1001	U.S. Patent No. 10,142,810
1002	File History of U.S. Patent No. 10,142,810
1003	Declaration of Dr. Kevin Almeroth in Support of <i>Inter Partes Review</i> of U.S. Patent No. 10,142,810
1004	<i>Curriculum Vitae</i> of Dr. Kevin Almeroth
1005	U.S. Provisional Patent Application No. 60/527,565
1006	U.S. Provisional Patent Application No. 60/689,686
1007	U.S. Patent Application 2002/0116461 ("Diacakis")
1008	U.S. Patent Application 2004/0001480 ("Tanigawa")
1009	U.S. Patent No. 7,428,580 ("Hullfish")
1010	IngenioShare's Infringement Contentions in Texas Litigation
1011	Texas Litigation Proposed Scheduling Order
1012	Fourteenth Supplemental Order Regarding Court Operations Under the Exigent Circumstances Created by the COVID-19 Pandemic
1013	Judge Albright's Standing Order re Inter-District Transfer
1014	Kurose, J. and Ross, K., Computer Networking: A Top-Down Approach Feature the Internet (2000)
1015	Kuehn, S., A Play Theory Analysis of Computer-Mediated Telecommunication (Apr. 20, 1990)
1016	Telecomputing in Japan
1017	Hernandez, R., ECPA and Online Computer Privacy (1988)
1018	Miller, A., Applications of Computer Conferencing to Teacher Education and Human Resource Development (1991)

Petitioner's Motion for *Pro Hac Vice* Admission  
 IPR2022-00202 (U.S. Pat. No. 10,142,810)

Exhibit No.	Description
1019	Benimoff, N. and Burns, M., Multimedia User Interfaces for Telecommunications Products and Services (1993)
1020	Falconer, W. and Hooke, J., Telecommunications Services in the Next Decade (1986)
1021	Hine, N.A., et al., An Adaptable User Interface to a Multimedia Telecommunications Conversation Service for People with Disabilities (1995)
1022	Bazaios, A., et al., Multimedia Architecture Offering Open Distance Learning Services over Internet
1023	Stein, J., et al., Chat and Instant Messaging Systems (2002)
1024	U.S. Patent Application 2002/ 0183114 (“Takahashi”)
1025	U.S. Patent No. 6,241,612 (“Heredia”)
1026	U.S. Patent Application 2003/0216178 (“Danieli”)
1027	International Patent Application WO 01/45343 (“Davies”)
1028	Grinter, R. and Palen, L., Instant Messaging in Teen Life (2002)
1029	File History of U.S. Patent No. 7,729,688
1030	File History of U.S. Patent No. 8,744,407
1031	File History of U.S. Patent No. 9,204,268
1032	File History of U.S. Patent No. 9,736,664
1033	U.S. Patent No. 10,142,810 Claim Listing
1034	Patil, S. and Kobsa, A., The Challenges in Preserving Privacy in Awareness Systems (2003)
1035	Internet Engineering Task Force RFC 2779 (Instant Messaging/Presence Protocol Requirements) (2000)
1036	Declaration of Yimeng Dou Pursuant to 37 C.F.R. 42.64(b)(2)
1037	Declaration of Jennifer A. Babbitt Pursuant to 37 C.F.R. 42.64(b)(2)

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Petitioner's Motion for *Pro Hac Vice* Admission  
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Exhibit No.	Description
1038	Supplemental Declaration of Dr. Kevin Almeroth Pursuant to 37 C.F.R. 42.64(b)(2)
1039	Comparison between Paper 13 (Patent Owner Response) and Ex. 2005 (Declaration of Professor George N. Rouskas, Ph.D.)
1040	Liferay.com, "What Is A Web Portal?" <i>available at</i> <a href="https://www.liferay.com/resources/l/web-portal">https://www.liferay.com/resources/l/web-portal</a>
1041	Gartner, "Mobile Portal," <i>available at</i> <a href="https://www.gartner.com/en/information-technology/glossary/mobile-portal">https://www.gartner.com/en/information-technology/glossary/mobile-portal</a>
1042	Deposition Transcript of Dr. George Rouskas
1043	Declaration of Lindsey Y. Shi In Support of Motion to Appear <i>Pro Hac Vice</i> On Behalf of Petitioner Epic Games, Inc.

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## **I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Epic Games, Inc. respectfully moves the Patent Trial & Appeal Board for the pro hac vice admission of Lindsey Y. Shi in this proceeding.

## **II. GOVERNING LAW, RULES, AND PRECEDENT**

The Board is authorized to recognize counsel pro hac vice pursuant to 37 C.F.R. § 42.10(c), which provides that:

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 as the Board may impose. For example, where the 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 showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The Board has stated that a motion for admission pro hac vice should include a “statement of facts showing there is good cause for the Board to recognize counsel pro hac vice during the proceeding” and “[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:

- i. Membership in good standing of the Bar of at least one State or the District of Columbia;
- ii. No suspensions or disbarments from practice before any court or administrative body;
- iii. No application for

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