

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EPIC GAMES, INC.,
Petitioner,

v.

INGENIOSHARE, LLC,
Patent Owner

U.S. PATENT NO. 10,492,038

Case IPR2022-00295

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

LIST OF PETITIONER'S UPDATED EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 10,492,038
1002	File History of U.S. Patent No. 10,492,038
1003	Declaration of Dr. Kevin Almeroth in Support of <i>Inter Partes Review</i> of U.S. Patent No. 10,492,038
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	Unused
1008	U.S. Patent No. 7,287,056 ("Loveland")
1009	U.S. Patent Application 2002/0183114 ("Takahashi")
1010	U.S. Patent Application 2004/0001480 ("Tanigawa")
1011	U.S. Patent No. 7,428,580 ("Hullfish")
1012	IngenioShare's Infringement Contentions in Texas Litigation
1013	Texas Litigation Proposed Scheduling Order
1014	Fourteenth Supplemental Order Regarding Court Operations Under the Exigent Circumstances Created by the COVID-19 Pandemic
1015	Judge Albright's Standing Order re Inter-District Transfer
1016	Kurose, J. and Ross, K., Computer Networking: A Top-Down Approach Feature the Internet (2000)
1017	Kuehn, S., A Play Theory Analysis of Computer-Mediated Telecommunication (Apr. 20, 1990)
1018	Telecomputing in Japan

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Exhibit No.	Description
1019	Hernandez, R., ECPA and Online Computer Privacy (1988)
1020	Miller, A., Applications of Computer Conferencing to Teacher Education and Human Resource Development (1991)
1021	Benimoff, N. and Burns, M., Multimedia User Interfaces for Telecommunications Products and Services (1993)
1022	Falconer, W. and Hooke, J., Telecommunications Services in the Next Decade (1986)
1023	Hine, N.A., et al., An Adaptable User Interface to a Multimedia Telecommunications Conversation Service for People with Disabilities (1995)
1024	Bazaio, A., et al., Multimedia Architecture Offering Open Distance Learning Services over Internet
1025	Stein, J., et al., Chat and Instant Messaging Systems (2002)
1026	U.S. Patent No. 6,241,612 (“Heredia”)
1027	U.S. Patent Application 2003/0216178 (“Danieli”)
1028	International Patent Application WO 01/45343 (“Davies”)
1029	Grinter, R. and Palen, L., Instant Messaging in Teen Life (2002)
1030	File History of U.S. Patent No. 8,744,407
1031	File History of U.S. Patent No. 9,736,664
1032	U.S. Patent No. 10,492,038 Claim Listing
1033	U.S. Patent No. 6,828,924 (“Gustavsson”)
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	File History of U.S. Patent No. 9,204,268
1037	Declaration of Yimeng Dou Pursuant to 37 C.F.R. 42.64(b)(2)

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Exhibit No.	Description
1038	Declaration of Jennifer A. Babbitt Pursuant to 37 C.F.R. 42.64(b)(2)
1039	Supplemental Declaration of Dr. Kevin Almeroth Pursuant to 37 C.F.R. 42.64(b)(2)
1040	Comparison between Paper 17 (Patent Owner Response) and Ex. 2005 (Declaration of Professor George N. Rouskas, Ph.D.)
1041	Liferay.com, "What Is A Web Portal?" <i>available at</i> https://www.liferay.com/resources/l/web-portal
1042	Gartner, "Mobile Portal," <i>available at</i> https://www.gartner.com/en/information-technology/glossary/mobile-portal
1043	Deposition Transcript of Dr. George Rouskas
1044	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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