UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HEWLETT PACKARD ENTERPRISE CO.,
ARUBA NETWORKS, LLC,
CISCO SYSTEMS, INC.,
APPLE INC.,

Petitioners,

- vs. -

BillJCo, LLC,

Patent Owner.

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IPR2022-00426
U.S. Patent No. 8,761,804

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**PETITIONERS' UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF ROSE CORDERO PREY UNDER 37 C.F.R. § 42.10**

PETITIONER'S UPDATED EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 8,761,804 ("the '804 Patent")
1002	Prosecution History of U.S. Patent No. 8,761,804
1003	Curriculum Vitae of Darrell D.E. Long
1004	Declaration of Darrell D.E. Long, dated January 14, 2022
1005	U.S. Patent No. 7,123,926 ("Himmelstein")
1006	U.S. Patent Application Publication No. 2003/0014181 ("Myr")
1007	U.S. Patent No. 6,327,535 ("Evans")
1008	U.S. Patent No. 8,600,341
1009	Prosecution History of U.S. Patent No. 8,600,341
1010	U.S. Patent Application Publication No. 2007/0030824 ("Ribaudo")
1011	*BillJCo, LLC v. Apple Inc.*, Case No. 6:21-cv-528, Apple, Inc.'s Opening Claim Construction Brief, Dkt. No. 32 (W.D. Tex. Dec. 2, 2021)
1012	*BillJCo, LLC v. Apple Inc.*, Case No. 6:21-cv-528, Agreed Scheduling Order, Dkt. No. 27 (W.D. Tex. Sept. 11, 2021)
1013	*BillJCo, LLC v. Cisco Sys., Inc.*, Case No. 2:21-cv-181, *BillJCo, LLC v. Hewlett-Packard Enterprise Co. and Aruba Networks*, Case No. 2:21-cv-183, Docket Control Order, Dkt. No. 44 (E.D. Tex. Oct. 25, 2021)
1014	Dufresne, A., et al., *How Reliable are Trial Dates Relied on by the PTAB in the Fintiv Analysis?* (Oct. 29, 2021)

Exhibit	Description
1015	*Fintiv, Inc. v. Apple Inc.*, Case No. 6:21-cv-926-ADA, Order (Oct. 4, 2021)
1016	*BillJCo, LLC v. Cisco Sys., Inc.*, Case No. 2:21-cv-181, Cisco Systems Inc.'s Motion to Transfer Venue, Dkt. No. 36 (E.D. Tex. Oct. 11, 2021)
1017	*BillJCo, LLC v. Hewlett-Packard Enterprise Co. and Aruba Networks*, Case No. 2:21-cv-183, Hewlett-Packard Enterprise Company's and Aruba Networks, LLC's Opposed Motion to Transfer Venue to the Northern District of California Under 28 U.S.C. § 1404, Dkt. No. 34 (E.D. Tex. Oct. 4, 2021)
1018	*BillJCo, LLC v. Apple Inc.*, Case No. 6:21-cv-528, Defendant's Motion to Dismiss Plaintiff's Claims of Willful Infringement as to Each Patents-in-Suit and Plaintiff's Claims of Indirect Infringement as to Each Patents-in-Suit, Dkt. No. 16 (W.D. Tex. Aug. 2, 2021)
1019	*BillJCo, LLC v. Apple Inc.*, Case No. 6:21-cv-528, Apple Inc.'s Opposed Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404, Dkt. No. 26 (W.D. Tex. Sept. 10, 2021)
1020	Curriculum Vitae listing Prior Litigation Engagements for Darrell D.E. Long
1021	Jackson, C., *Radar and LORAN*, Popular Electronics (July 1959)
1022	Letter from Krishnan Padmanabhan, dated January 14, 2022
1023	Declaration of Rose Cordero Prey In Support of Motion to Appear *Pro Hac Vice*

Pursuant to 37 C.F.R. § 42.10, and pursuant to the authorization provided by the United States Patent and Trademark Office's Patent Trial and Appeal Board ("Board") in Paper Number 5, dated January 26, 2022 ("the Notice"), Petitioners submit this unopposed motion for Rose Cordero Prey to appear *pro hac vice*. Petitioners respectfully request the Board to recognize Ms. Prey as counsel *pro hac vice* during this proceeding and demonstrate good cause for doing so as shown below.

I. TIME FOR FILING

Pursuant to the authorization provided in the Notice, this motion for *pro hac vice* admission is being filed no sooner than twenty one (21) days after service of the petition. The requisite fees for this motion have been paid.

II. STATEMENT OF FACTS

Pursuant to the Notice, the following statements of facts show that good cause exists for the Board to recognize Ms. Prey *pro hac vice*.

Petitioners' counsel for this proceeding, Andrew R. Sommer, is a registered practitioner (Reg. No. 53,932).

Ms. Prey is an experienced litigation attorney with more than fifteen (15) years of patent litigation experience. Ex. 1035 at ¶ 8. She has been involved in numerous patent infringement cases in federal district courts across the country. *Id.* at ¶ 8.

Ms. Prey is a member in good standing in the bar of New York, the U.S. Court of Appeals for the Federal Circuit, and several U.S. District Courts. Ex. 1035 at ¶ 1.

Ms. Prey has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against her. Ex. 1035 at ¶ 2.

Ms. Prey has obtained substantial familiarity with the involved patent, the prior art, and the various issues raised in this proceeding. Ex. 1035 at ¶ 8. Moreover, Ms. Prey has reviewed the involved patent, the Petition, the prior art, and all other cited materials. *Id.* She was involved in the preparation of the Petition. *Id.* at ¶ 8. Given her extensive patent litigation experience and familiarity with the Petition, the cited materials, and the patented technology, Ms. Prey has established familiarity with the subject matter at issue in this proceeding. *Id.*

Ms. Prey 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 Title 37 of the Code of Federal Regulations, and she agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. § 11.19 (a). Ex. 1035 at ¶¶ 5-6.

In the last three years, she has appeared *pro hac vice* before the Board in the following matters: *Hewlett Packard Enterprise Company v. Intellectual Ventures II LLC*, Case No. IPR2021-01376; *Hewlett Packard Enterprise Company v.*

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