

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

THALES VISONIX, INC.
Patent Owner

Case No. IPR2022-01308

Patent No. 7,725,253

**PETITIONER'S UNOPPOSED MOTION FOR THE *PRO HAC VICE*
ADMISSION OF AKSHAY S. DEORAS**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Meta Platforms, Inc. (“Meta” or “Petitioner”) respectfully moves the Patent Trial & Appeal Board (“Board”) for the *pro hac vice* admission of Akshay S. Deoras 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

admission to practice before any court or administrative body ever denied; iv. No sanctions or contempt citations imposed by any court or administrative body; v. The individual seeking to appear 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 37 C.F.R.; vi. The individual will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a); vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and viii. Familiarity with the subject matter at issue in the proceeding."

Unified Patents, Inc. v. Parallel Iron, LLC, IPR 2013-00639 (MPT) (Paper 7 at 3-4).

III. STATEMENT OF FACTS

Based on the following facts, supported by the attached declaration, Meta requests that Mr. Deoras, be admitted *pro hac vice* in this proceeding. As an initial matter, Meta's lead counsel in this matter, W. Todd Baker (Reg. No. 45,265), is a registered practitioner. Counsel for Petitioner has contacted Patent Owner's and the Real Party in Interests' counsel by email to inquire whether they object to the relief requested in this Motion, and their counsel confirmed that they have no objections. Mr. Deoras is concurrently applying to appear *pro hac vice* in IPR2022-01294,

IPR2022-01298, IPR2022-01301, IPR2022-01302, IPR2022-01303, IPR2022-01304, and IPR2022-01305.

A. Mr. Deoras Meets The Requirements For Admission *Pro Hac Vice*

1. Mr. Deoras has more than 14 years of experience as a litigation attorney specializing in patent litigation, representing clients in patent litigation matters in various United States District Courts, the Court of Appeals for the Federal Circuit, and before the International Trade Commission.

2. Mr. Deoras is very familiar with U.S. Patent No. 7,725,253, and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner's Request for *Inter Partes* Review of U.S. Patent No. 7,725,253, which forms the basis for this proceeding. He is counsel for Meta in the co-pending district court action related to this patent (*Gentex Corporation et al. v Meta Platforms, Inc. et al.*, Case No. 4:22-cv-03892-YGR (N.D. Cal.)), and is involved with factual and technical developments in that matter.

3. Mr. Deoras is a member in good standing of the Bar of the State of California and the State of New York. He is admitted to practice before the U.S. District Court for the Northern District of California and the U.S. Court of Appeals for the Federal Circuit.

4. Mr. Deoras has never been suspended or disbarred from practice before any court or administrative body.

5. Mr. Deoras has never had a court or administrative body deny an application for admission to practice.

6. Mr. Deoras has never been sanctioned or cited for contempt by any court or administrative body.

7. Mr. Deoras 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 37 C.F.R.

8. Mr. Deoras agrees to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. In the past three years, Mr. Deoras was admitted *pro hac vice* as counsel before the PTAB in the following actions:

- *Inter Partes* Review IPR2020-01579, IPR2020-01583, and IPR2020-01585 as counsel for Apcon, Inc.
- *Inter Partes* Review IPR2020-001517, IPR2020-001518, IPR2020-001612, IPR2020-001613, and IPR2021-00187 as counsel for Omnitrac, LLC
- *Inter Partes* Review IPR2021-00323, IPR2021-00324, and IPR2021-00325 as counsel for XRS Corporation

IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. DEORAS IN THIS PROCEEDING

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 any other conditions the Board may impose. 37 C.F.R. § 42.10(c).

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