

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Google LLC,
Petitioner

v.

WAG Acquisition, L.L.C.
Patent Owner

IPR2022-01413
U.S. Patent No. 9,762,636 B2

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF NAINA SONI UNDER 37 C.F.R. § 42.10(c)**

Petitioner's Motion for *Pro Hac Vice* Admission
U.S. Patent No. 9,762,636 B2

Petitioner Google LLC respectfully requests that the Board recognize Naina Soni, Esq., as counsel *pro hac vice* during this proceeding. Patent Owner's counsel do not oppose this Motion.

BACKGROUND

Petitioner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the Order—Authorizing Motion for *Pro Hac Vice* Admission in Case No. IPR2013-00639, Paper 7 (“the Order”) and pursuant to the Board's advanced authorization expressed in the Board's Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response dated September 27, 2022 (Paper No. 5).

STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Ms. Naina Soni *pro hac vice*.

Ms. Soni is a litigation attorney and has been involved in numerous complex litigations in state and federal courts. Ms. Soni's biography is attached hereto as Exhibit 1116 to this Motion.

Ms. Soni has reviewed U.S. Patent No. 9,762,636 and the Petition and all other documents already filed in this proceeding. Further, Ms. Soni is counsel for Google LLC in the pending litigation between the parties involving U.S. Patent No.

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9,762,636 before the United States District Court for the Northern District of California entitled *WAG Acquisition, L.L.C. v. Google LLC*, Case No. 3:22-cv-05772-JD, and, as such, is familiar with the subject matter at issue in this proceeding.

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Ms. Soni as counsel *pro hac vice* during this proceeding.

DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Naina Soni, Esq. attached hereto as Exhibit 1115 as required by the Order.

Dated: November 14, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e)(4)(i) *et seq.*, a complete copy of the attached **PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF NAINA SONI UNDER 37 C.F.R. § 42.10(c)**, and related documents are being served via email on the 14th day of November 2023, upon Patent Owner's attorneys of record:

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