

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RESIDEO TECHNOLOGIES, INC. and
CENTRAL SECURITY GROUP – NATIONWIDE, INC.,¹
Petitioners, v.

UBIQUITOUS CONNECTIVITY, LP,
Patent Owner.

Case IPR2019-01335
Patent 8,064,935 B2

**PATENT OWNER’S MOTION FOR THE
PRO HAC VICE ADMISSION OF DANIEL A. KENT**

¹ Central Security Group – Nationwide, Inc., who filed a petition in IPR2019-01609, has been joined as a petitioner in this proceeding.

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Ubiquitous Connectivity, LP (“Patent Owner”) respectfully moves the Patent Trial & Appeal Board (“Board”) for the *pro hac vice* admission of Daniel A. Kent in this proceeding. Petitioners have indicated that they do not oppose.

II. BACKGROUND

Patent Owner’s Unopposed Motion for *Pro Hac Vice* Admission is being filed pursuant to and in compliance with the Notice of Filing Date Accorded to Petition and Time Period for Filing Patent Owner Preliminary Response, which was filed July 29, 2019 (Paper No. 5) (the “Notice”). The Notice authorizes the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c). Further to the Notice, such “motions shall be filed in accordance with the ‘Order – Authorizing Motion *for Pro Hac Vice* Admission’ in Case IPR2013-00639, Paper 7” (the “Order”).

III. TIME OF FILING

This Unopposed Motion for *Pro Hac Vice* admission is being filed in accordance with the Notice Authorizing the Filing of a Motion for *Pro Hac Vice* admission, and is filed greater than 21 days after that Notice.

IV. STATEMENT OF FACTS

As required by the Order, the following statement of facts, supported by the attached Declaration of Daniel A. Kent in Support of Motion for *Pro Hac Vice* Admission (Ex. 2003), shows that there is good cause for the Patent Trial and Appeal Board (“Board”) to recognize Mr. Kent *pro hac vice* in this proceeding. As required by 37 C.F.R. § 42.10(c), lead counsel, Cortney Alexander, is a registered practitioner experienced in proceedings before the USPTO.

Mr. Kent is an experienced litigation attorney. Mr. Kent has been litigating intellectual property disputes for more than 28 years, and has been involved in numerous patent litigation cases in federal courts. Mr. Kent’s experience includes representing a wide range of clients in complex intellectual property litigation.

Mr. Kent is a member in good standing of the State Bar of Georgia, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Supreme Court, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the Eleventh Circuit, the United States District Court for the Northern District of Georgia, the United States District Court for the Middle District of Georgia, the United States District Court for the Eastern District of Texas, and the United States District Court for the Southern District of Indiana. His mailing address is Kent & Risley LLC, 5755 N

Point Pkwy Ste 57, Alpharetta, Georgia 30022, his email address is

dankent@kentrisley.com, and his phone number is (404) 585-4214.

Mr. Kent has worked with lead counsel in most aspects of this proceeding. As such, Mr. Kent has reviewed and is very familiar with (i) U.S. Patent No. 8,064,935, the patent at issue in this proceeding, (ii) the prior art relied upon in Petitioners' Petitions, (iii) the legal and factual arguments that have been addressed by Petitioners, and (iv) the developments in this proceeding since the filing of Petitioners' Petitions. Accordingly, he has established familiarity with the subject matter at issue in these proceedings and the conduct of these proceedings to date.

Mr. Kent has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§11.01 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Daniel A. Kent (Ex. 2003) as required by the Order.

V. ANALYSIS

The facts described above and in the Kent Declaration (Ex. 2003) establish that there is good cause to admit Mr. Kent *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c). Lead counsel is a registered practitioner, Mr. Kent is an

experienced litigating attorney, and Mr. Kent has an established familiarity with the subject matter at issue in these proceedings.

VI. CONCLUSION

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Kent *Pro Hac Vice* during these proceedings.

Respectfully submitted,

Date: April 6, 2020

/Cortney S. Alexander/
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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on April 6, 2020, a copy of the foregoing was provided via electronic service to the Petitioners by serving the correspondence addresses of record as follows:

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