

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FREE STREAM MEDIA CORP. D/B/A SAMBA TV,

Petitioner,

v.

GRACENOTE, INC.,

Patent Owner

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Case IPR2020-00216

Patent No. 9,066,114

**PATENT OWNER'S MOTION FOR ADMISSION**  
***PRO HAC VICE* UNDER 37 C.F.R. § 42.10(C)**

## **I. INTRODUCTION**

Patent Owner Gracernote, Inc. (“Patent Owner”) respectfully requests that the Board recognize Megan Redmond, Esq., as counsel *pro hac vice* during the above captioned proceeding. Patent Owner files this Motion for Admission *Pro Hac Vice* in accordance with the Board’s December 10, 2019 Notice of Filing Date (Paper 3), 37 C.F.R. §§ 42.10(c), and the Board’s March 4, 2020 Order (Paper 11) authoring such a Motion.

## **II. THE CONDITIONS FOR *PRO HAC VICE* ADMISSION ARE MET**

The conditions outlined in 37 C.F.R. § 42.10(c) and the Order – Authorizing Motion for *Pro Hac Vice* Admission in case IPR2013-00639, Paper 7 are met. Patent Owner is filing this motion more than 21 days after December 6, 2019, the date of service of the Petition.

Lead Counsel for Patent Owner (Jennifer C. Bailey, Reg. No. 52,583) is registered to practice before the Board. 37 C.F.R. § 42.10(c).

Second, good cause exists to permit Ms. Redmond to be admitted *pro hac vice* for this proceeding. Ms. Redmond has established familiarity with the subject matter at issue in this proceeding, including extensive knowledge of U.S. Patent No. 9,066,114 (“114 Patent”) and the prior art submitted in the instant Petition. Exhibit 2010, *Declaration of Megan J. Redmond* at ¶ 8. Ms. Redmond is a highly experienced patent litigation attorney and has been involved in numerous patent

litigations before the federal courts. *Id.* at ¶ 9. She has particular experience litigating patents relating to digital fingerprinting. *Id.* As part of her representation of Gracenote in this and other matters, she has discussed the relevant technologies in depth with expert witnesses. *Id.* at ¶ 10. She is also participated in the drafting and revision of the Patent Owner's Preliminary Responses to be filed in Inter Partes Review No. 2020-00216, 2020-00217, and 2020-00218. *Id.* at ¶ 11. Therefore, Ms. Redmond's knowledge would be of substantial benefit to Patent Owner in this proceeding.

### **III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR**

A Declaration of Ms. Redmond as Exhibit 2010 accompanies Patent Owner's Motion for *Pro Hac Vice* Admission.

### **IV. CONCLUSION**

Patent Owner respectfully requests that the Board recognize Ms. Redmond as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

/Jennifer C. Bailey/

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*ATTORNEYS FOR PATENT OWNER*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PATENT OWNER'S MOTION FOR ADMISSION PRO HAC VICE UNDER 37 C.F.R. § 42.10(C) was served on March 10, 2020, by email on the following counsel of record for Petitioner:

Don Daybell at D2DPTABDocket@orrick.com  
Alyssa Caridis at A8CPTABDocket@orrick.com

Dated: March 10, 2020

Respectfully submitted,

BY: /s/ Jennifer C. Bailey  
Jennifer C. Bailey, Reg. No. 52,583

*ATTORNEY FOR PATENT OWNER*