UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS, LLC,
Petitioner,

v.

VL COLLECTIVE IP LLC,
Patent Owner.

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Case IPR2022-01086
Patent 8,605,794

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**PATENT OWNER'S UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF JAIME F. CARDENAS-NAVIA**

## I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Patent Owner VL Collective IP LLC ("VL Collective") requests that the Board admit Jaime F. Cardenas-Navia *pro hac vice* in this proceeding.

## II. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding

In accordance with 37 C.F.R. § 42.10(c), 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. "[W]here lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigation attorney and has an established familiarity with the subject matter at issue in the proceeding." § 42.10(c). The facts, supported by the attached Declaration of Jaime F. Cardenas-Navia in Support of Motion for Admission *Pro Hac Vice* ("Cardenas-Navia Decl."), here establish good cause for the Board to recognize Jaime F. Cardenas-Navia *pro hac vice* during this proceeding.

1. Lead counsel, Christine E. Lehman, is a registered practitioner.

2. Counsel, Jaime F. Cardenas-Navia, is a partner at the law firm of Reichman Jorgensen Lehman & Feldberg LLP.

3. Mr. Cardenas-Navia is an experienced litigator with substantial experience in patent litigation. Mr. Cardenas-Navia has been practicing in the field

of intellectual property law, and particularly, patent litigation, for over eight years. Cardenas-Navia Decl., ¶ 1. In particular, he has been in private practice and litigating patent cases since August 2014. He has been counsel in over a dozen patent infringement cases and has represented clients in at least five United States District Courts. *Id*. at ¶ 3. Before law school, Mr. Cardenas-Navia worked as a Patent Examiner at the United States Patent and Trademark Office for three years. *Id*. at ¶ 1.

4. Mr. Cardenas-Navia is a member in good standing of the Bar of the State of New York and is admitted to practice before the United States District Court of the Southern District of New York. *Id*. at ¶ 2. In the past three (3) years, he has appeared *pro hac vice* in one proceeding before the United States Patent and Trademark Office: IPR2020-00276. *Id*. at ¶ 7.

5. Mr. Cardenas-Navia is familiar with the subject matter at issue in this proceeding, including the patent, its prosecution history, and the identified references. *Id*. at ¶ 8. He is counsel in the following cases, which are related to and involve the same patent at issue in this proceeding: *Starz Entertainment, LLC et al. v. VL Collective IP LLC et al.*, No. 21-cv-1448-JLH (D. Del.); *VideoLabs, Inc. et al. v. Amazon.com, Inc. et al.*, No. 22-00079-ADA (W.D. Tex.); and *VideoLabs, Inc. et al. v. Netflix, Inc.*, No. 22-229-CFC (D. Del.). *Id*.

6. Mr. Cardenas-Navia has never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body, nor has any court or administrative body deny his application for admission to practice. *Id*. at ¶ 4. He has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R. *Id*. at ¶ 5. He agrees to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 *et seq*. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id*. at ¶ 6.

## III. Conclusion

For the foregoing reasons, Kove respectfully requests that the Board admit Jaime Cardenas-Navia *pro hac vice* in this proceeding.

Dated: December 27, 2022

Respectfully submitted,

*/s/ Christine E. Lehman*

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*Lead Counsel for Patent Owner*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on December 27, 2022 a copy of the foregoing document and Exhibit 2005 were served by email to counsel for Petitioner:

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