

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Trend Micro Inc.
Petitioner

v.

Kajeet, Inc.
Patent Owner

IPR2023-00178
U.S. Patent No. 7,899,438

**PETITIONER'S UNOPPOSED MOTION FOR
ADMISSION *PRO HAC VICE* OF CRISTINA Q. ALMENDAREZ
PURSUANT TO 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10, Petitioner respectfully requests the *pro hac vice* admission of attorney Cristina Q. Almendarez in this proceeding. The facts, supported by the attached Declaration of Cristina Q. Almendarez in Support of Motion for Admission *Pro Hac Vice* (“Almendarez Decl.”), establish good cause to admit Ms. Almendarez *pro hac vice* in this proceeding. Petitioner has conferred with Patent Owner, and Patent Owner confirmed that it does not oppose this Motion.

I. STATEMENT OF FACTS

Lead counsel Charanjit Brahma is a registered practitioner (Reg. No. 46,574) and experienced in *inter partes* proceedings in the USPTO. Backup counsel Manish K. Mehta (Reg. No. 64,570) and Samuel J. Ruggio are registered practitioners (Reg. No. 74,543) and experienced in *inter partes* proceedings in the USPTO. Along with Charanjit Brahma, Manish K. Mehta, Samuel J. Ruggio, Cristina Almendarez represents Trend Micro Inc. in connection with the pending district court action captioned *Kajeet, Inc. v. Trend Micro Inc.*, Case No. 6:21-cv-00389-ADA (W.D. Tex.). Cristina Almendarez joined Benesch as an intellectual property litigation associate in 2020. (Almendarez Decl. ¶ 1.)

Ms. Almendarez is a member in good standing of the Illinois State Bar, and the United States District Courts for the Northern District of Illinois, the Eastern District of Michigan, and the Eastern District of Texas. (*Id.* at ¶ 3.)

She has never been suspended or disbarred from practice before any court or administrative body. (*Id.* at ¶ 4.) She has never had an application for admission to practice before any court or administrative body denied. (*Id.*) Nor has any court or administrative body imposed sanctions or contempt citations against her. (*Id.*)

Ms. Almendarez 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. (*Id.* at ¶ 5.) She acknowledges and agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a). (*Id.*)

Ms. Almendarez has established familiarity with the subject matter at issue in this proceeding. (*Id.* at ¶ 7.) She has reviewed in detail and is familiar with U.S. Patent No. 7,899,438 and all exhibits relied upon by Petitioner in this proceeding. (*Id.*) Moreover, Ms. Almendarez has engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with Charanjit Brahma, who is a registered practitioner and the lead counsel for Petitioner in this proceeding. (*Id.*)

II. ANALYSIS

The facts contained in the Statement of Facts above and Ms. Almendarez's Declaration establish that there is good cause to admit Ms. Almendarez pro hac vice in this proceeding under 37 C.F.R. § 42.10. Lead counsel Charanjit Brahma and

backup counsel Manish K. Mehta and Samuel J. Ruggio are registered practitioners and experienced in *inter partes* proceedings in the USPTO. Ms. Almendarez is an experienced patent litigation attorney, and she has an established familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests the Board admit Cristina Q. Almendarez *pro hac vice* in this proceeding.

Dated: December 22, 2022

Respectfully submitted,

/Charanjit Brahma/
Charanjit Brahma (Reg. No. 46,754)

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2022, a copy of PETITIONER'S UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE OF CRISTINA Q. ALMENDAREZ PURSUANT TO 37 C.F.R. § 42.10 was served was served via electronic mail upon counsel of record for Petitioners at the following addresses:

Robert L. Hails
rhails@bakerlaw.com

Timothy D. Casey
TCasey@bakerlaw.com

Jason F. Hoffman
jhoffman@bakerlaw.com

/Charanjit Brahma/

BENESCH FRIEDLANDER COPLAN &
ARONOFF LLP
100 Pine Street, Suite 3100
San Francisco, CA 94111
Tel: (628) 600-2250

Attorney for Petitioner