UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner

v.

ZENTIAN LIMITED,
Patent Owner

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Case No. IPR2023-00033
U.S. Patent No. 7,587,319 B2

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

## I. INTRODUCTION

Petitioner Apple Inc. ("Petitioner") respectfully requests the Board recognize Christina Canino, Esq., as counsel *pro hac vice* during the above captioned proceeding. Petitioner files this Motion for Admission *Pro Hac Vice* in accordance with the Board's December 15, 2022, Notice of Filing Date (Paper 3) and 37 C.F.R. §§ 42.10(c) and 42.22. The Patent Owner does not oppose this motion.

## II. 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 2, 2022, the date of service of the Petition.

Lead Counsel for Petitioner (Jennifer C. Bailey, Reg. No. 52,583) is registered to practice before the Board and is actively participating in this IPR. 37 C.F.R. § 42.10(c).

Good cause exists to permit Christina Canino to be admitted *pro hac vice* for this proceeding. Christina Canino has established familiarity with the subject matter at issue in this proceeding, including knowledge of U.S. Patent No. 7,587,319 ("the '319 Patent"), the Petition, and the prior art submitted in the instant Petition. Exhibit 1043, *Declaration of Christina Canino* at ¶ 8. Christina Canino solely practices in patent litigation and IPRs and has been involved in several patent

litigations before the federal courts and assisted on many IPRs. *Id.* at ¶ 9. She has experience litigating patents and participating in IPRs where the patents related to both the electrical and mechanical fields. *Id.* She has argued before the relevant tribunals in patent litigation proceedings, assisted with depositions, and discussed these areas in-depth with expert witnesses and engineers. *Id.* Therefore, Christina Canino's knowledge would be of substantial benefit to Petitioner in this proceeding.

Counsel for Patent Owner does not oppose Christina Canino appearing *pro hac vice* during this proceeding.

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

A Declaration of Christina Canino as Exhibit 1043 accompanies Petitioner's Motion for *Pro Hac Vice* Admission.

## IV. FEES

Petitioner approves the $250.00 fee in accordance with 42.15(e) for *pro hac vice* admission may be charged to deposit account 50-6159.

## V. CONCLUSION

Petitioner respectfully requests that the Board recognize Christina Canino as counsel *pro hac vice* during this proceeding.

Date: August 23, 2023

Respectfully submitted,

ERISE IP, P.A.

BY: /Jennifer C. Bailey/
Jennifer C. Bailey, Reg. No. 52,583
Adam P. Seitz, Reg. No. 52,206
Adam M. Sandwell, Reg. No. 72,484

COUNSEL FOR PETITIONER

**CERTIFICATE OF SERVICE ON PATENT OWNER**

**UNDER 37 C.F.R. § 42.105(a)**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 23, 2023, the foregoing *Petitioner's Motion For Admission Pro Hac Vice Under 37 C.F.R. § 42.10(C)* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

Peter C. Knops (peter@noroozipc.com)
Kayvan B. Noroozi (kayvan@noroozipc.com)
Katherine Rhoades (katherine.rhoades@bartlitbeck.com)
Nevin Gewertz (nevin.gewertz@bartlitbeck.com)

*/s/ Jennifer C. Bailey*
Jennifer C. Bailey, Reg. No. 52,583
*ATTORNEY FOR PETITIONER*