UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.
Petitioner,

v.

MEETRIX IP, LLC,
Patent Owner.

Case IPR2023-00371
U.S. Patent No. 8,339,997

MOTION FOR ADMISSION *PRO HAC VICE* OF CAROLYN CHANG

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Petitioners Zoho Corporation and Zoho Corporation Pvt., Ltd. (hereinafter "Zoho" or "Petitioners") request that the Board admit Carolyn Chang *pro hac vice* in this *inter partes* review proceeding.

II. THERE IS GOOD CAUSE TO GRANT THIS MOTION

As established in the declaration of Carolyn Chang (Exhibit 1039) submitted herewith, Ms. Chang is an experienced patent litigation attorney and has established familiarity with the subject matter at issue in this proceeding. She is a member in good standing of the State Bar of California. She has been admitted to practice before many United States District Courts and the United States Court of Appeals for the Federal Circuit. She has been in practice since 2001 with the majority of her time spent focused on patent litigation. Ms. Chang has familiarity with subject matter at issue in this proceeding as demonstrated by the fact that she has reviewed the patents-at-issue, namely U.S. Patent Nos. 9,253,332, 9,094,525, 9,843,612, 8,339,997, the cited prior art, the petition, and the evidence submitted in this proceeding. Ms. Chang is litigation counsel for Zoho in the District Court proceeding in the Western District of Texas, *Meetrix IP, LLC v. Zoho Corporation*, No. 6:21-cv-01288 (W.D. Tex.), in which the patent owner is asserting infringement by Zoho of the patents-at-issue.

Ms. Change has been admitted *pro hac vice* in other proceedings before the Board, namely IPR2019-00377, IPR2021-00939, IPR2021-00938, IPR2021-00937, and IPR2021-00936.

Lead counsel and back-up counsel for Petitioner in this proceeding, Hector J. Ribera and C.J. Alice Chuang, respectively, are registered practitioners.

III. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the board admit Carolyn Chang *pro hac vice* in this proceeding.

Respectfully submitted,

Date: July 31, 2023

By: */C.J. Alice Chuang/*

C. J. Alice Chuang (Reg. No. 65,914)

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 31, 2023, a copy of this MOTION FOR ADMISSION PRO HAC VICE OF RYAN J. MARTON and all supporting exhibits were provided via electronic mail (by consent) to the Patent Owner by serving the correspondence address identified in the Mandatory Notices:

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