

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ORACLE CORPORATION,
Petitioner

v.

PARKING WORLD WIDE LLC,
Patent Owner

Case No.: IPR2023-00385
U.S. Patent No. 10,438,421
Original Issue Date: October 8, 2019

Title: PARKING STATUS SYSTEM

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10**

LISTING OF EXHIBITS

EX. NO.	DESCRIPTION
1001	U.S. Patent No. 10,438,421 to Bashani (the “421 Patent”)
1002	File History of U.S. Patent No. 10,438,421 (the “421 FH”)
1003	Declaration of Joseph Paradiso (“Paradiso Decl.”)
1004	Curriculum Vitae of Joseph Paradiso
1005	U.S. Patent Appl. No. 2006/0059037 (“Ivey”)
1006	Japanese Patent Publication No. JP2008-217835 (“Matsumoto”)
1007	Certified English language translation of Japanese Patent Publication No. JP2008-217835 (“Matsumoto”) and associated translator’s declaration
1008	U.S. Patent Application Publication No. 2008/0114675 (“Ward”)
1009	U.S. Patent No. 7,123,166 (“Haynes”)
1010	U.S. Patent Application Publication No. 2006/0170566 (“Slemmer”)
1011	U.S. Patent Publication No. 2006/0250278 (“Tillotson”)
1012	Complaint (Dkt. 1) filed in <i>Parking World Wide LLC v. City of Clayton</i> , No. 4:22-cv-01373, dated December 26, 2022
1013	Complaint (Dkt. 1) filed in <i>Parking World Wide LLC v. City of St. Louis</i> , No. 4:22-cv-01252, dated November 22, 2022
1014	Complaint (Dkt. 1) filed in <i>Parking World Wide LLC v. City of San Francisco et al.</i> , No. 4:21-cv-01499 (E.D. Mo.), dated December 23, 2021
1015	Memorandum and Order (Dkt. 55), filed in <i>Parking World Wide LLC v. City of San Francisco et al.</i> , No. 4:21-cv-01499 (E.D. Mo.), dated July 21, 2022

EX. NO.	DESCRIPTION
1016	Plaintiff's Notice of Dismissal (Dkt. 57), filed in <i>Parking World Wide LLC v. City of San Francisco et al.</i> , No. 4:21-cv-01499 (E.D. Mo.), dated August 15, 2022
1017	Summons to Oracle, Inc. with proof of delivery issued in <i>Parking World Wide LLC v. City of San Francisco et al.</i> , No. 4:21-cv-01499 (E.D. Mo.)
1018	Case Docket Printout of <i>Parking World Wide LLC v. City of Clayton</i> , No. 4:22-cv-01373
1019	Case Docket Printout of <i>Parking World Wide LLC v. City of St. Louis</i> , No. 4:22-cv-01252
1020	United Nations Convention on Road Signs and Signals, Chapter XI. Transport and Communications B. Road Traffic, Vienna, November 8, 1968
1021	M.Y.I. Idris et al., <i>Smart Parking System using Image Processing Techniques in Wireless Sensor Network Environment</i> , Information Technology Journal, Vol. 8, pp. 114-127 (2009)
1022	S. Feiner et al., <i>A Touring Machine: Prototyping 3D Mobile Augmented Reality Systems for Exploring the Urban Environment</i> , Digest of Papers. First International Symposium on Wearable Computers, Cambridge, MA, USA, pp. 74-81 (1997)
1023	U.S. Patent Application Publication No. 2002/0044152 ("Abbott")
1024	G. Maubon, <i>A little bit of history from 2006: Nokia MARA project</i> , available at https://www.augmented-reality.fr/2009/03/un-petit-peu-dhistoire-de-2006-projet-mara-de-nokia/
1025	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission <i>Pro Hac Vice</i>

Pursuant to 37 C.F.R. § 42.10, Petitioner Oracle Corporation (“Oracle” or “Petitioner”) respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

I. STATEMENT OF FACTS

Pursuant to 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. For example, where the lead counsel is a registered practitioner, a motion to appear pro hac vice by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The facts, supported by the accompanying Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission *Pro Hac Vice* (EX1025, “Bobrow Declaration”), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding.

Lead counsel Donald Daybell is a registered practitioner.

Jared Bobrow is an experienced litigation attorney. Mr. Bobrow has been a litigating attorney for more than 33 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 31 of those years. *Id.* Mr. Bobrow is a member in good standing of the California State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the First Circuit; California State Supreme Court; the United States District Court for the Eastern District of Texas; and the United States District Courts for the Central, Eastern, Northern and Southern Districts of California. *Id.* ¶¶ 1-4.

Mr. Bobrow has familiarity with the subject matter at issue in this proceeding and in the related district court case *Parking World Wide LLC v. City of San Francisco et al.*, Case No. 4:21-cv-01499 (E.D. Mo., filed December 23, 2021)¹, in which U.S. Patent No. 10,438,421 was asserted by the Patent Owner. Bobrow Declaration ¶ 9.

¹ Oracle was named as a defendant in the 4:21-cv-01499 action, but Parking World Wide's claims against Oracle were dismissed on July 21, 2022. EX1015. The case was dismissed on August 15, 2022. EX1016.

Mr. Bobrow 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 the C.F.R, and he agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Bobrow Declaration ¶¶ 5-6.

II. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Bobrow Declaration, establish that there is good cause to admit Mr. Bobrow *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel is a registered practitioner, Mr. Bobrow is an experienced patent litigation attorney, and Mr. Bobrow has familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

Dated: January 26, 2023

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /Donald Daybell/

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Patent Owner as detailed below.

<i>Date of Service</i>	January 26, 2023
<i>Manner of Service</i>	Electronic Mail
<i>Documents Served</i>	Petitioner's Motion for Admission <i>Pro Hac Vice</i> of Jared Bobrow Pursuant to 37 C.F.R. § 42.10; Ex. 1025, Declaration of Jared Bobrow In Support of Petitioner's Motion for Admission <i>Pro Hac Vice</i>
<i>Persons Served</i>	<u>Patent Owner's Counsel of Record</u> Charles C. McCloskey 13321 N. Outer 40 Rd. Ste. 100 Town & Country, MO 63017 (636) 527-9962 Office (314) 550-8830 (314) 786-1201 ccmlaw@socket.net Christopher S. Swiecicki 16100 Chesterfield Parkway W, Ste. 368 Chesterfield, MO 63017 636.778.0209 Office 314.341.5796 Cell 636.238.4358 Fax Chris@SwiecickiLaw.com

/Karen Johnson/

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