

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.
Petitioner,

v.

APPLIED CAPITAL, INC.
Patent Owner.

IPR2023-00419
U.S. Patent Number 9,728,082

**PATENT OWNER'S MOTION FOR
PRO HAC VICE ADMISSION OF CHIJOKE E. OFFOR**

Patent Owner Applied Capital, Inc. (“ACI” or “Patent Owner”) respectfully requests that the Board recognize and admit Chijioke E. Offor as counsel pro hac vice to represent ACI during the above-captioned proceeding. The bases and support for ACI’s requests are as follows.

A. Timing of ACI’s Request

ACI’s motion is being filed no sooner than twenty-one (21) days after the service of the petition.

B. Good Cause Bases for ACI’s Request

The Board may recognize counsel pro hac vice during a proceeding upon a showing of good cause, subject to the condition that lead counsel is a registered practitioner and a declaration of the party seeking admission is included with the Request. 37 C.F.R. § 42.10(c). Good cause has been shown where, for example, the attorney for which pro hac vice admission is sought is an experienced patent litigator and has a familiarity with the subject matter at issue in the proceeding, and the admission of the party’s counsel will facilitate the party’s ability to effectively participate in the proceeding. ACI respectfully submits that all of these conditions have been met here.

UNM’s lead counsel, Luis M. Ortiz, is a registered practitioner. As demonstrated by his declaration, Mr. Offor is an experienced litigator who has

litigated patent infringement cases for various parties in federal district courts throughout the United States and before the Court of Appeals for the Federal Circuit. *Id.* at ¶¶ 3-4. Mr. Offor's legal career spans over fifteen (15) years. See *Id.* at ¶ 2. Mr. Offor has extensive experience in litigating patent infringement cases and has served as lead counsel in such cases. *Id.* at ¶ 4.

Mr. Offor has read and is familiar with the patent at issue in this proceeding and its file history, as well as the prior art and other arguments that have been asserted by Petitioner.

ACI submits that Mr. Offor's participation will assist it and its lead counsel in effectively participating in this proceeding and will facilitate timely completion of the trial proceeding.

Mr. Offor has never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body, and has never had an application for admission to practice before a court or agency denied. *Id.* at ¶¶ 5-6. Mr. Offor is a member in good standing of the Bar of Texas. *Id.* at ¶ 2. Mr. Offor agrees to be subject to the Office Patent Trial Practice Guide, the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R., and the USPTO's Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et. seq., and submit to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* at ¶¶ 9-10.

C. Conclusion

For the foregoing reasons, ACI respectfully requests that the PTAB recognize Chijioke E. Offor as its counsel, pro hac vice, in this proceeding.

Date: September 29, 2023

Respectfully submitted,

By: /s/ Luis M. Ortiz

Luis M. Ortiz, Lead Counsel
USPTO Reg. No. 36,230
Email: lortiz@olpatentlaw.com
Kermit D. Lopez
USPTO Reg. No. 41,953
Email: klopez@olpatentlaw.com
Ortiz & Lopez, PLLC
6605 Uptown Blvd NE, Suite 240
Albuquerque, NM 87110
Telephone: (505) 314-1310

Halima Shukri Ndai,
Reg. No. 76,352
Chijioke E. Offor
THE SHORE FIRM LLP
901 Main Street, Suite 3300
Dallas, TX 75202
Phone: (214) 593-9110
Fax: (214) 593-9111
hndai@shorefirm.com
coffor@shorefirm.com

*Counsel for Patent Owner
Applied Capital, Inc*

CERTIFICATE OF SERVICE

I certify the foregoing PATENT OWNER'S MOTION FOR ADMISSION
PRO HAC VICE OF CHIJOKE E. OFFOR was served on September 29, 2023 on
Petitioner by filing through the PTAB's P-TACTS System as well as e-mailing a
copy to:

Eliot D. Williams, Reg. No. 50,822
eliot.williams@bakerbotts.com

Katharine M. Burke
katharine.Burke@bakerbotts.com

Robert Maier, Reg. No. 54,291
robert.maier@bakerbotts.com

Michael Knierim, Reg. No. 78,268
michael.knierim@bakerbotts.com

Amy E. Bergeron, Reg. No. 76,974
amy.bergeron@bakerbotts.com

Matthew Thompson, Reg. No. 80,905
matthew.thompson@bakerbotts.com

By: /s/ Luis M. Ortiz

Luis M. Ortiz, Lead Counsel
USPTO Reg. No. 36,230

Date: September 29, 2023