UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOX, INC., and DROPBOX, INC.,
Petitioners

v.

TOPIA TECHNOLOGY, INC.,
Patent Owner

Case No. IPR2023-00427
U.S. Patent No. 9,143,561

PETITIONER'S UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION OF REUBEN CHEN UNDER 37 C.F.R. § 42.10(c)

Petitioners Box, Inc. and Dropbox, Inc. respectfully request that the Board recognize Reuben Chen, Esq., as counsel *pro hac vice* during this proceeding. Patent Owner's counsel do not oppose this Motion.

BACKGROUND

Petitioner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the Order—Authorizing Motion for *Pro Hac Vice* Admission in Case No. IPR2020-01486 (MPT) ["the Order"], and pursuant to the Board's advanced authorization expressed in the Board's Notice of Filing Date Accorded and time for Filing Patent Owner's Preliminary Response dated February 9, 2023 (Paper No. 6).

STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Chen *pro hac vice*.

Mr. Chen is an experienced litigation attorney and has been involved in numerous complex litigations in state and federal courts. Mr. Chen's biography is attached hereto as Exhibit 1038 to this Motion.

Mr. Chen has reviewed U.S. Patent No. 9,143,561 and the petition already filed in this proceeding. Further, Mr. Chen is counsel for Box, Inc. and Dropbox, Inc. in the pending litigation between the parties involving U.S. Patent No. 9,143,561 before the U.S. District Court for the Western District of Texas entitled *Topia*

Technology, Inc. v. Box, Inc., Case No. 6:21-cv-01372-ADA and *Topia Technology, Inc. v. Dropbox, Inc.*, Case No. 6:21-cv-01373-ADA, as such, is familiar with the subject matter at issue in this proceeding.

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Mr. Chen as counsel *pro hac vice* during this proceeding.

DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Reuben Chen attached hereto as Exhibit 1039 as required by the Order.

Dated: October 25, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e)(4)(i) *et seq*., a complete copy of the attached **PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF REUBEN CHEN UNDER 37 C.F.R. § 42.10(c),** and related documents are being served via email on the 25th day of October 2023, upon Patent Owner's attorneys of record:

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