UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.,
Petitioner,

v.

TAASERA LICENSING LLC,
Patent Owner.

Case IPR2023-00573
Patent 8,955,038 B2

PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF MICHAEL R. RUECKHEIM UNDER 37 C.F.R. § 42.10

Pursuant to 37 C.F.R. § 42.10 and the authorization provided by the United States Patent and Trademark Office's Patent Trial and Appeal Board ("Board") in Paper Number 3 (dated February 22, 2023 ("the Notice")), Petitioner, Palo Alto Networks, Inc. ("Petitioner"), submits this unopposed motion for Michael R. Rueckheim to appear *pro hac vice*. Petitioner respectfully requests that the Board recognize Mr. Rueckheim as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so as shown below.

STATEMENT OF FACTS

A. Michael R. Rueckheim

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Rueckheim *pro hac vice*.

Lead counsel for this proceeding, Juan C. Yaquian, is a registered practitioner (Reg. No. 70,755).

Mr. Rueckheim is a litigation attorney who has been involved in multiple patent infringement cases in federal district courts. Ex. 1008 ¶ 8. He has experience in various aspects of patent infringement matters and has participated in multiple patent cases in federal courts, including trials and claim construction hearings. *Id.*

Mr. Rueckheim is a member in good standing of the Bars of the State of Texas, California and New York and is admitted to practice before the Federal Circuit Court of Appeal, Fifth Circuit Court of Appeal, U.S. District Court for the Western District

of Texas, U.S. District Court for the Eastern District of Texas, U.S. District Court for the Southern District of Texas, U.S. District Court for the Northern District of Texas, U.S. District Court for the Northern District of California, U.S. District Court for the Southern District of New York, U.S. District Court for the Northern District of Illinois, and U.S. District Court for the Eastern District of Wisconsin. *Id.* ¶ 1.

Mr. Rueckheim has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. *Id.* ¶¶ 2-4.

Mr. Rueckheim has obtained substantial familiarity with the involved patent, the prior art, and the various issues raised in this proceeding. *Id.* ¶ 8. Moreover, Mr. Rueckheim has reviewed the involved patent, the Petition, the prior art, and all other cited materials. *Id*. Given his extensive patent litigation experience and his familiarity with the instant Petition, the cited materials, and the patented technology, Mr. Rueckheim has established familiarity with the subject matter at issue in this proceeding. *Id*.

Mr. Rueckheim 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 Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* ¶¶ 5-6.

Mr. Rueckheim has appeared *pro hac vice* in the last three years before the Board in Case Nos. IPR2020-00859, IPR2020-01081, IPR2020-01383, IPR2021-00343, IPR2021-00344, IPR2021-00345, IPR2021-00940, IPR2021-00941, IPR2022-00418, IPR2022-00236, IPR2022-00744, and IPR2022-00745. *Id.* ¶ 7.

Given Mr. Rueckheim's familiarity with the subject matter at issue in this proceeding, Petitioner respectfully submits that it has shown good cause for the Board to recognize Mr. Rueckheim as counsel *pro hac vice* during this proceeding.

This Motion is accompanied by the Declaration of Mr. Rueckheim. Ex. 1008.

Dated: October 2, 2023

Respectfully submitted,

/Juan C. Yaquian/
Juan C. Yaquian
Lead Counsel for Petitioner

WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002-2925
Reg. No. 70,755
Telephone: 713-651-2600
Fax: 713-651-2700
Email: Winston-PAN-Taasera@winston.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(a), I certify that, on October 2, 2023, I caused to be served true and correct copy of the foregoing "PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF MICHAEL R. RUECKHEIM, UNDER 37 C.F.R. § 42.10," by electronic mail on counsel of record for Patent Owner as follows:

Peter Lambrianakos (Reg. No. 58,279)
plambrianakos@fabricantllp.com

Vincent J. Rubino, III (Reg. No. 68,594)
vrubino@fabricantllp.com

Alfred R. Fabricant
ffabricant@fabricantllp.com

FABRICANTLLP
411 Theodore Fremd Avenue, Suite 206 South
Rye, New York 10580

Dated: October 2, 2023

Respectfully submitted,

/Juan C. Yaquian/
Juan C. Yaquian
Lead Counsel for Petitioner

WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002-2925
Reg. No. 70,755
Telephone: 713-651-2600
Fax: 713-651-2700
Email: Winston-PAN-Taasera@winston.com