

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORCEPOINT LLC,
Petitioner

v.

WEBROOT, INC. AND OPEN TEXT, INC.,
Patent Owners.

IPR2023-00786
U.S. Patent No. 10,025,928

**PETITIONER'S UNOPPOSED MOTION FOR PRO HACE VICE
ADMISSION OF AKSHAY S. DEORAS**

Petitioner Forcepoint LLC (“Forcepoint” or “Petitioner”) requests the Board recognize Akshay S. Deoras as counsel *pro hac vice* during this proceeding. A power of attorney from Petitioner appointing him as backup counsel was previously filed (Paper 1).

This Motion for Admission *Pro Hac Vice* is being filed with the Board’s authorization (Paper 5 at 2) under 37 C.F.R. 42.10(c). The Declaration of Akshay S. Deoras supporting this motion is filed as Exhibit 1011. Petitioner has confirmed that Patent Owner does not oppose this motion in correspondence with Petitioner dated September 5, 2023.

I. STATEMENT OF FACTS ESTABLISHING GOOD CAUSE

Forcepoint’s lead counsel is a registered practitioner: Kat Li (Reg. No. 64,857).

As demonstrated below, there is good cause for the Board to recognize Mr. Deoras’s *pro hac vice*.

1. Mr. Deoras is an experienced patent litigation attorney with over 14 years of experience representing clients in patent litigation matters in various United States District Courts.

2. Mr. Deoras has an established familiarity with the subject matter of U.S. Patent No. 10,025,928, at issue in this proceeding through participation in the district court litigation which involves U.S. Patent 10,025,928 (*Webroot, Inc. et al*

v. Forcepoint LLC, No. 6:22-cv-342 (W.D. Tex.) (filed March 31, 2022) (consolidated with lead case No. 6:22-cv-243)), and through participation in the briefing of the currently pending *inter partes* review proceeding.

3. Mr. Deoras is a member in good standing of the Bars of the States of California and New York. He is also admitted to practice before the United States District Court for the Northern District of California, United States District Court for the Southern District of California, and the United States Court of Appeals for the Federal Circuit.

4. Mr. Deoras has never been suspended or disbarred from practice before any court or admission.

5. Mr. Deoras has never had a court or administrative board deny an application for admission to practice.

6. Mr. Deoras has never been sanctioned or cited for contempt by any court or administrative body.

7. Mr. Deoras has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trial set forth in 37 C.F.R. part 42.

8. Mr. Deoras agrees to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(e).

9. In the past three years, Mr. Deoras has applied for or appeared *pro hac vice* in the following USPTO proceedings: IPR2023-00078, IPR2023-00077, IPR2023-00031, IPR2023-00032, IPR2023-00020, IPR2023-00021, IPR2022-01572, IPR2022-01573, IPR2022-01521, IPR2022-01338, IPR2022-01298, IPR2022-01301, IPR2022-01302, IPR2022-01303, IPR2022-01304, IPR2022-01305, IPR2022-01308, IPR2022-01294, IPR2022-01266, IPR2021-00323, IPR2021-00324, IPR2021-00325, IPR2021-00124, IPR2021-00187, IPR2021-01612, IPR2021-01613, IPR2021-01517, IPR2021-01518, IPR2021-01579, IPR2021-01583, and IPR2021-01585.

II. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. DEORAS IN THIS PROCEEDING

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 any other conditions the Board may impose. 37 C.F.R. § 42.10(c). Forcepoint's lead counsel in Patent Trial and Appeal Board matters, Kat Li, is a registered practitioner before the Board. Based on the facts contain herein, good cause exists to admit Mr. Deoras *pro hac vice*.

Mr. Deoras is an experienced patent litigation attorney. Mr. Deoras has significant experience in patent litigation matters and is actively involved with the strategy and fact development in the matter. In view of Mr. Deoras's extensive patent

litigation and his knowledge of the subject matter of this proceeding, Forcepoint has a substantial need for Mr. Deoras's *pro hac vice* admission and his involvement in the continued prosecution of this proceeding.

III. CONCLUSION

For the foregoing reasons, Forcepoint respectfully requests that Akshay S. Deoras be admitted *pro hac vice*.

Respectfully submitted,

Dated: October 24, 2023

By: /Kat Li/
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CERTIFICATE OF SERVICE

In compliance with 37 C.F.R. § 42.6(e), the undersigned hereby certifies that a copy of the foregoing document was served on October 24, 2023, via electronic mail to OpenText_Webroot@kslaw.com and the attorneys of record below:

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