UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case IPR2023-00947
Patent 10,248,298

PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF CLIFF WIN, JR.

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Patent Owner Immersion Corporation. ("Immersion") requests that the Board admit Cliff Win, Jr. *pro hac vice* in this *inter partes* review proceeding.

II. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding.

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding, subject to the conditions set forth therein, and any others that the Board may impose. Patent Owner sets forth the following facts in support of this Motion:

1. Lead counsel for Patent Owner in this proceeding, David Schumann, is a registered practitioner.
2. Cliff Win, Jr. is an experienced litigation attorney and has established familiarity with the subject matter at issue in this proceeding. Accompanying this Motion as Exhibit 2001 is the Declaration of Cliff Win, Jr. in Support of the Motion for Admission *Pro Hac Vice* ("Win Decl."). In his declaration, Mr. Win attests, among other things, that he is a member in good standing of the California State Bar. Win Dec. ¶ 3. Mr. Win further attests that he has been admitted to practice before several United States District Courts. *Id.* Mr. Win

further attests that he has been practicing in the field of litigation since 2010, with the majority of that time focused specifically on patent litigation. *Id.* ¶ 2. In addition, Mr. Win attests that his familiarity with the subject matter at issue in this proceeding is demonstrated by his review of the patent at issue, the Petition for *Inter Partes* Review, the cited prior art, and the other evidence presented in this proceeding, as well as his representation of Immersion in the District Court action in which Immersion has accused Meta Platforms, Inc. f/k/a Facebook, Inc. ("Meta") of infringing U.S. Patent No. 10,248,298. *Id.* ¶¶ 9-10.

3. In his declaration, Mr. Win attests to each of the required items set forth in 37 C.F.R. § 42.10(c). *Id.* ¶¶ 2-10.
4. Immersion has conferred with Petitioner prior to filing this Motion, and Petitioner has confirmed that it does not have any objections.

III. Conclusion

For the foregoing reasons, Immersion respectfully requests that the Board admit Cliff Win, Jr. *pro hac vice* in this proceeding.

Respectfully submitted,

Date: August 9, 2023

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CERTIFICATE OF SERVICE

As authorized by Petitioner's Mandatory Notices, I hereby certify that on August 9, 2023, a copy of this document has been served in its entirety by electronic mail on Petitioner's lead and backup counsel.

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