

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENERAL MOTORS LLC,
Petitioner,

v.

EDWARD H. NORTRUP,
Patent Owner.

Case IPR2023-00994
Patent No. 10,444,028 B2

**PETITIONER’S UNOPPOSED MOTION FOR PRO HAC VICE
ADMISSION OF JOSEPH HERRIGES UNDER 37 C.F.R. § 42.10(c)**

UPDATED EXHIBIT LIST

GM-1001	U.S. Patent No. 10,444,028 to Edward H. Nortrup (“the ’028 patent”)
GM-1002	Excerpts from the Prosecution History of the ’028 patent (“the Prosecution History”)
GM-1003	Expert Declaration of Dr. Michael Braasch
GM-1004	U.S. Patent Pub. No. 2003/0055542 to Knockeart et al. (“Knockeart”)
GM-1005	U.S. Patent Pub. No. 2002/0026278 to Feldman et al. (“Feldman”)
GM-1006	U.S. Patent Pub. No. 2005/0096840 to Simske (“Simske”)
GM-1007	U.S. Patent No. 7,203,598 to Whitsell (“Whitsell”)
GM-1008	U.S. Patent No. 6,615,133 to Boies et al. (“Boies”)
GM-1009	U.S. Patent No. 5,845,227 to Peterson (“Peterson”)
GM-1010	U.S. Patent No. 7,027,915 to Craine (“Craine”)
GM-1011	<i>Bearing Straight</i> Forbes (May 4, 1998) (Located at https://www.forbes.com/forbes-life-magazine/1998/0504/096.html?sh=7d25a7166b54)
GM-1012	J. Hightower and G. Borriello, "Location systems for ubiquitous computing," in <i>Computer</i> , vol. 34, no. 8, pp. 57-66, Aug. 2001, doi: 10.1109/2.940014
GM-1013	U.S. Patent Pub. No. 2003/0009277 to Fan et al. (“Fan”) (cited during prosecution of the ’028 patent)

GM-1014	U.S. Patent No. 6,377,810 to Geiger et al. (“Geiger”)
GM-1015	U.S. Patent No. 6,456,854 to Chern et al. (“Chern”)
GM-1016	U.S. Patent Pub. No. 2004/0192299 to Wilson et al. (“Wilson”)
GM-1017	U.S. Patent Pub. No. 2004/0224702 to Chaskar (“Chaskar”)
GM-1018	Second Expert Declaration of Dr. Michael Braasch
GM-1019	Declaration of Joseph Herriges in Support of Pro Hac Vice Admission

Pursuant to 37 C.F.R. § 42.10(c), Petitioner respectfully requests that the Board recognize Joseph Herriges as counsel *pro hac vice* in this proceeding. Petitioner seeks the counsel of Joseph Herriges due to his experience in other patent-related matters and particularly due to his familiarity with the substantive and technical issues involved in this proceeding. This motion is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was entered on June 9, 2023.

Counsel for Petitioner conferred with counsel for Patent Owner prior to filing this motion, and Patent Owner does not oppose this motion. The oral hearing is currently scheduled for August 29, 2024.

I. Statement of Facts

Joseph Herriges is a patent litigation attorney with more than 15 years of experience representing clients in cases involving automotive, telecommunications, design patents, and mechanical and electrical engineering. Mr. Herriges regularly litigates patent cases before various U.S. district courts around the country, the International Trade Commission and the Court of Appeals for the Federal Circuit. Through his practice in such cases, Mr. Herriges has gained substantial experience in jury trials, bench trials, discovery, Markman hearings, and appeals. Apart from a clerkship at the Court of Appeals for the Federal Circuit, Mr. Herriges has spent most of his career at Fish &

Richardson P.C., focusing on patent litigation and patent issues. Petitioner provides Appendix A, as evidence of Mr. Herriges's biography.

Mr. Herriges also has particular experience and familiarity with the substantive and technical issues involved in this *inter partes* review proceeding. Petitioner has invested significant financial resources in defending against the asserted patents, and Mr. Herriges will be taking an active role with respect to the patent that is the subject of the present proceeding. Moreover, Petitioner has developed a particular relationship with Mr. Herriges such that Petitioner desires to continue the relationship with Mr. Herriges for the purpose of this proceeding.

II. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Joseph Herriges. Accordingly, Petitioner submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Joseph Herriges as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Dated: August 6, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on August 6, 2024, a complete and entire copy of this Petitioner's Unopposed Motion for *Pro Hac Vice* Admission of Joseph Herriges and Exhibit 1019 were provided by email, to the Patent Owner, by serving the correspondence addresses of record as follows:

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