

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TVISION INSIGHTS, INC.,

Petitioner,

v.

THE NIELSEN COMPANY (US), LLC,

Patent Owner

Case IPR2023-01014
Patent No. 11,470,243

PATENT OWNER'S MOTION FOR ADMISSION
***PRO HAC VICE* UNDER 37 C.F.R. § 42.10(C)**

I. INTRODUCTION

Patent Owner, The Nielsen Company (US), LLC (“Patent Owner”) respectfully requests that the Board recognize Megan Redmond, Esq., as counsel *pro hac vice* during the above captioned proceeding. Patent Owner files this Motion for Admission *Pro Hac Vice* in accordance with the Board’s July 11, 2023, Notice of Filing Date (Paper 6) and 37 C.F.R. §§ 42.10(c) and 42.22. The Petitioner does not oppose this motion.

II. THE CONDITIONS FOR *PRO HAC VICE* ADMISSION ARE MET

The conditions outlined in 37 C.F.R. § 42.10(c) and the Order – Authorizing Motion for *Pro Hac Vice* Admission in case IPR2013-00639, Paper 7 are met. Patent Owner is filing this motion more than 21 days after June 16, 2023, the date of service of the Petition.

Lead Counsel for Patent Owner (Jennifer C. Bailey, Reg. No. 52,583) is registered to practice before the Board. 37 C.F.R. § 42.10(c).

Second, good cause exists to permit Ms. Redmond to be admitted *pro hac vice* for this proceeding. Ms. Redmond has established familiarity with the subject matter at issue in this proceeding, including extensive knowledge of 11,470,243 (“’243 Patent”) and the prior art submitted in the instant Petition. Exhibit 2019, *Declaration of Megan J. Redmond* at ¶ 8. Ms. Redmond is a highly experienced patent litigation attorney and has been involved in numerous patent litigations before the federal courts. *Id.* at ¶ 9. She has experience litigating patents and participating in IPRs involving patents of a similar nature. *Id.* She has handled numerous IPRs and district court cases involving similar technology

and argued before the relevant tribunals, conducted depositions, and discussed these areas in depth with expert witnesses and engineers. *Id.*

She also participated in the drafting and revision of the Patent Owner's Preliminary Response. *Id.* at ¶ 10. Therefore, Ms. Redmond's knowledge would be of substantial benefit to Patent Owner in this proceeding.

Counsel for Petitioner does not oppose Ms. Redmond appearing *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

A Declaration of Ms. Redmond as Exhibit 2019 accompanies Patent Owner's Motion for *Pro Hac Vice* Admission.

IV. FEES

Patent Owner approves the \$250.00 fee in accordance with 42.15(e) for *Pro hac vice* admission may be charged to deposit account 50-6159.

V. CONCLUSION

Patent Owner respectfully requests that the Board recognize Ms. Redmond as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

ERISE IP, P.A.

BY: /s/ Jennifer C. Bailey
Jennifer C. Bailey

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ATTORNEYS FOR PATENT OWNER

CERTIFICATE OF SERVICE ON CPC

UNDER 37 C.F.R. § 42.6

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on April 29, 2024, the foregoing *Patent Owner's Motion For Admission Pro Hac Vice Under 37 C.F.R. § 42.10(c)* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for CPC:

Harper Batts (Reg. No. 56,160)
Chris Ponder (Reg. No. 77,167)
Jeffrey Liang (Reg. No. 69,043)

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/s/ Jennifer C. Bailey

Jennifer C. Bailey, Reg. No. 52,583

ATTORNEY FOR PATENT OWNER