UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

RJ TECHNOLOGY LLC,
Patent Owner.

Case IPR2023-01350
Patent No. 7,749,641

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

Patent Owner RJ Technology LLC respectfully requests that the Board recognize Daniel Zaheer as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Patent Owner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the "Order—Authorizing Motion for *Pro Hac Vice* Admission" in Case No. IPR2013-00639, Paper 7 (MPT) ["the Order"]. In particular, this motion for *pro hac vice* Admission is being filed no sooner than twenty one (21) days after service of the petition.

Further, this motion is authorized by the Notice of Filing Date Accorded To Petition and Time For Filing Patent Owner Preliminary Response (Paper 3).

Petitioner Apple does not oppose this motion.

II. STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Zaheer *pro hac vice*.

Mr. Zaheer is an experienced patent litigation attorney with more than fifteen years of experience. In that time, he has served as counsel in numerous patent infringement suits, including before the U.S. District Courts for the Eastern District of Virginia and Eastern District of Texas. Mr. Zaheer is admitted to practice in the U.S. District Courts for the Central District of California, Eastern District of California, Northern District of California, Northern District of Illinois, and Eastern

District of Texas.

Mr. Zaheer has reviewed and is very familiar with (i) U.S. Patent No. 7,749,641 (the "'641 patent"), the patent-at-issue in this proceeding, (ii) the prior art relied upon in Petitioner's Petition, (iii) the legal and factual arguments that have been addressed by Patent Owner, and (iv) the developments in this proceeding since the filing of the Petition. Mr. Zaheer was counsel for RJ Technology LLC in the related district court cases, *RJ Technology LLC v. Apple Inc.*, Case No. 8:22-cv-1874-JVS-JDE (CDCA) and *RJ Technology LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Civil Action No. 2:22-cv-00401-JRG (EDTX) in which RJ Technology LLC has asserted the '641 against Petitioner and other parties.

Because Mr. Zaheer is an experienced practitioner with an established familiarity with the subject matter of this proceeding, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Zaheer as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Daniel Zaheer attached hereto as Exhibit 2003 as required by the Order.

Date: April 4, 2024

Respectfully submitted,

/Minghui Yang/_____
Minghui Yang
Reg. No. 71,989
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

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

The names and email addresses of the parties being served are as follows:

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Respectfully submitted,

/Minghui Yang/

Date: April 4, 2024