UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TURNSIGNL, INC. AND TURNSIGNL FOUNDATION,
Petitioners,

v.

REDMON JEANG LLC,
Patent Owner.

CASE No. IPR2024-00104
U.S. Patent No. 11,494,862

***PRO HAC VICE* MOTION TO ADMIT ATTORNEY JUANITA DELOACH, PH.D PURSUANT TO 37 C.F.R. § 42.10(c)**

TurnSignl, Inc. and TurnSignl Foundation ("Petitioners") hereby file this motion pursuant to 37 C.F.R. § 42.10(c) for Juanita DeLoach, Ph.D. to appear *pro hac vice* on its behalf before the Patent Trial and Appeal Board. In support of this motion, Petitioners submit the following:

1. Petitioners have already designated a registered practitioner, Mark C. Nelson (Reg. No. 43,830), as lead counsel, and Petitioners intend to designate Dr. DeLoach as one of its back-up counsel in the event that this motion is granted.

2. In support of this motion, Dr. DeLoach has executed a Declaration, Exhibit 1046, in accordance with the Order in IPR2013-00639, Paper 7, entered October 15, 2013.

3. Dr. DeLoach is a patent litigator with ten years of experience, including significant experience in the area of patent validity and invalidity. In the many patent litigations in which she has been counsel, she has worked extensively on issues relating to 35 U.S.C. §§ 101, 102, 103, and 112. Dr. DeLoach's work includes reviewing and analyzing numerous prosecution histories, reviewing and analyzing prior art references, developing arguments for contentions, briefing for motions to dismiss, summary judgment motions, appeals, working closely with experts on their reports, conducting discovery, attending depositions, and preparing arguments for trial. Dr. DeLoach has also spent significant time learning the procedure of *inter partes* review proceedings.

4. As counsel for Petitioners, Dr. DeLoach has become very familiar with patents that cover technology that is similar to the technology at issue in this proceeding (e.g., mobile legal counsel systems and methods). Further, Dr. DeLoach spent time preparing and reviewing the filings for this proceeding. Accordingly, Dr. DeLoach is familiar with the specific subject matter at issue in this proceeding.

Given Dr. DeLoach's familiarity with the underlying technology, the patent at issue, and the prior art, Petitioners ask that the Board grant this Motion to afford them the benefit of having an additional attorney authorized on this matter and recognize Juanita DeLoach *pro hac vice* during this proceeding.

Respectfully submitted,

Dated: November 28, 2023

By: /Mark C. Nelson/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing *PRO HAC VICE* MOTION TO ADMIT ATTORNEY JUANITA DELOACH, PH.D. was served November 28, 2023 via Priority Mail Express to the correspondence address of record to:

Fulton Jeang PLLC
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A courtesy copy was also served via electronic mail on Patent Owner's counsel of record in District Court litigation:

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