UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner,

v.

VIDEO SOLUTIONS PTE. LTD.,

Patent Owner.

IPR2024-00194
U.S. Patent No. 9,204,099

PATENT OWNERS'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF JASON ZUCCHI UNDER 37 C.F.R. § 42.10(C)

PATENT OWNER'S EXHIBIT LIST

EX2001	Declaration of Dr. Jacob Sharony
EX2002	Second Amended Docket Control Order, *Video Solutions PTE. LTD. v. Cisco Systems, Inc.*, 2:23-cv-00222-JRG, Doc. 56 (E.D. Tex. Nov. 27, 2023)
EX2003	"Texas Patent Trial Scrubbed After Lawyers, Witnesses Ready to Go," Bloomberg Law, Aug. 18, 2023 [accessed from https://news.bloomberglaw.com/ip-law/texas-patent-trial-scrubbed-after-lawyers-witnesses-ready-to-go]
EX2004	Calendar Events Set for 2/10/2025 - 2/11/2025, Judge Rodney Gilstrap [accessed Feb. 27, 2024]
EX2005	Comparison of Districts Within the First Circuit — 12-Month Period Ending December 31, 2023 [accessed from https://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2023/12/31-3]
EX2006	Defendant's Amended Invalidity Contentions, *Video Solutions PTE. LTD. v. Cisco Systems, Inc.*, 2:23-cv-00222-JRG (E.D. Tex. Dec. 11, 2023)
EX2007	Declaration of Jason Zucchi in Support of *Pro Hac Vice* Admission
EX2008	Declaration of Todd Vare in Support of *Pro Hac Vice* Admission

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner, Video Solutions PTE. LTD., ("Patent Owner"), respectfully requests that the Board recognize Jason Zucchi as counsel *pro hac vice* in this proceeding. Patent Owner seeks the counsel of Mr. Zucchi 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, dated Nov. 29, 2023 (Paper No. 3). Patent Owner has conferred with Petitioner and confirmed that Petitioner will not oppose this motion for Mr. Zucchi's *pro hac vice* admission in this IPR.

Where the lead counsel is a registered practitioner, a non-registered practitioner may be permitted to appear *pro hac vice* "upon showing that counsel is an experienced litigating attorney and has established familiarity with the subject matter at issue in the proceeding." 37 CFR § 42.10(c); *Unified Patents, Inc. v. Parallel Iron, LLC,* Case IPR2013-00639 (PTAB October 15, 2013) (Paper 7) (setting forth requirements for *pro hac vice* admission). As set forth in the declaration being submitted herewith (EX2007), Mr. Zucchi is an attorney and partner at Barnes & Thornburg LLP with significant experience representing clients in patent litigation matters in a variety of different venues, including in US District Courts and in the PTAB through prior *pro hac vice* admissions.

Mr. Zucchi has familiarity with the particular subject matter in this IPR proceeding. Mr. Zucchi is also is counsel of record and has had significant

involvement in the parallel district court litigation involving (among others) the same patent at issue in this proceeding, *Video Solutions Pte. Ltd. v. Cisco Systems, Inc.*, 2-23-cv-00222 (E.D. Tex.).

In support of this motion, Patent Owner submits the following:

1. Patent Owner's lead counsel, Christopher C. Hoff (Reg. No. 67,738) is a registered practitioner.

2. In support of this motion, Mr. Zucchi has executed a Declaration (EX2007) in accordance with the Order in IPR2013-00639, Paper 7.

3. Mr. Zucchi is an experienced litigator with nearly 17 years of experience litigating patent cases in various United States District Courts and before the Federal Circuit. EX2007, ¶¶2-3.

4. Mr. Zucchi is familiar with the patent at issue, U.S. Patent No. 9,204,099 ("the '099 patent"), and the documents of record in this proceeding. EX2007, ¶10. Mr. Zucchi currently represents Patent Owner in the district court litigation between Patent Owner and Petitioner regarding the '099 patent. *Id.* Accordingly, Mr. Zucchi is familiar with the specific subject matter at issue in this proceeding.

Accordingly, Patent Owner submits that there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Jason Zucchi as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Date: __June 4, 2024_____

/Christopher C. Hoff, Reg. No. 67,738/
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Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on June 4, 2024, a complete and entire copy of this Patent Owner's Motion for *Pro Hac Vice* of Todd Vare and Exhibit 2007 were provided via email, to the Petitioner by serving the email correspondence addresses of record as follows:

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