

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS, LLC,
Patent Owner.

Case No. IPR2024-00214
Patent No. 11,068,609

**PETITIONER’S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF NATHAN R. SPEED**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,068,609
1002	Prosecution History of U.S. Patent No. 11,068,609
1003	Declaration of Samrat Bhattacharjee, Ph.D. (“Bhattacharjee”)
1004	Curriculum Vitae of Samrat Bhattacharjee, Ph.D.
1005	U.S. Patent Application Publication 2004/0049687A1 (“Orsini”)
1006	U.S. Patent Application Publication 2003/0200176A1 (“Foster”)
1007	RESERVED
1008	RESERVED
1009	Security First Innovation’s 2023-08-14 Infringement Contentions, Chart B in <i>Security First Innovations, LLC v. Google LLC</i> , 2-23-cv-00097 (E.D. Va.)
1010	Redline Comparison of U.S. Patent Application Publication 2004/0049687A1 to U.S. Patent No. 11,068,609
1011	U.S. Patent No. 5,991,414
1012	U.S. Patent Application Publication No. 2002/0169842
1013	U.S. Patent No. 6,393,568
1014	RESERVED
1015	U.S. Patent Application Publication No. 2006/0053112
1016	U.S. Patent Application Publication No. 2004/0005061
1017	U.S. Patent No. 5,412,722
1018	U.S. Patent No. 7,689,829
1019	U.S. Patent Application Publication No. 2003/0081784
1020	RESERVED
1021	RESERVED
1022	U.S. Patent Application Publication No. 2002/0126850
1023	U.S. Patent No. 5,812,671
1024	RESERVED
1025	RESERVED
1026	RESERVED
1027	U.S. Patent No. 7,251,828
1028	U.S. Patent Application Publication No. 2003/0167314
1029	U.S. Patent No. 6,598,161
1030	U.S. Patent Application Publication No. 2005/0198490
1031	U.S. Patent Application Publication No. 2002/0169808
1032	U.S. Patent No. 6,345,101

Exhibit	Description
1033	U.S. Patent No. 8,707,034
1034	U.S. Patent Application Publication No. 2003/0105719
1035	U.S. Patent No. 4,238,853
1036	U.S. Patent No. 6,819,766
1037	RESERVED
1038	RESERVED
1039	U.S. Patent No. 7,885,405
1040	U.S. Patent Application Publication No. 2005/0210269
1041	U.S. Patent Application Publication No. 2005/0120065
1042	U.S. Patent No. 6,363,481
1043	RESERVED
1044	U.S. Patent Application Publication No. 2003/0191938
1045	U.S. Patent Application Publication No. 2003/0028493
1046	U.S. Patent Application Publication No. 2003/0016820
1047	U.S. Patent Application Publication No. 2002/0042859
1048	U.S. Patent Application Publication No. 2003/0188153
1049	PCT Application Publication No. WO 2004/057461
1050	U.S. Patent No. 7,529,834
1051	U.S. Patent Application Publication No. 2006/0034457
1052	U.S. Patent Application Publication No. 2005/0256972
1053	U.S. Patent Application Publication No. 2004/0049700
1054	U.S. Patent No. 5,675,653
1055	U.S. Patent Application Publication No. 2006/0062384
1056	U.S. Patent No. 6,490,353
1057	U.S. Patent Application Publication No. 2003/0044020
1058	U.S. Patent No. 7,092,524
1059	PCT Application Publication No. WO 2005/024686
1060	U.S. Patent Application Publication No. 2006/0206889
1061	U.S. Patent Application Publication No. 2006/0059347
1062	RESERVED
1063	Rule 16(b) Scheduling Order in <i>Security First Innovations, LLC v. Google, LLC</i> , 2:23-cv-00097-JWK-RJK, Dkt. 54 (July 20, 2023)
1064	Google LLC's Proposed Claim Terms for Construction in <i>Security First Innovations, LLC v. Google, LLC</i> , 2:23-cv-00097-JWK-RJK (Nov. 11, 2023)
1065	Letter from A. Mayron to D. Perlson re Preliminary Proposed Constructions in <i>Security First Innovations, LLC v. Google, LLC</i> , 2:23-cv-00097-JWK-RJK (Nov. 11, 2023)

Exhibit	Description
1066	U.S. Patent Application Publication No. 2004/0228479
1067	RESERVED
1068	Declaration of Nathan R. Speed in Support of Motion for Admission <i>Pro Hac Vice</i>

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3, Petitioner Google LLC respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding, IPR2024-00214. Petitioner is concurrently seeking admission of Mr. Speed *pro hac vice* in related proceeding IPR2024-00215. Patent Owner has been consulted and has indicated it does not object to Mr. Speed being admitted *pro hac vice* in this proceeding.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

37 C.F.R. § 42.10(c) provides:

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The facts here establish good cause for the Board to recognize Mr. Speed *pro hac vice* in this proceeding.

First, as set forth in Mr. Speed's declaration (Ex. 1068), Mr. Speed has an established familiarity with the subject matter at issue in these proceedings. He has worked on preparing and reviewing the materials submitted in this proceeding.

Second, Mr. Speed has extensive patent litigation experience and is expected to use his experience to support Lead Counsel during the proceeding, including during depositions. Good cause exists to have Petitioner appoint as counsel Mr. Speed, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Speed attests to all of the representations set forth in part 2(b) of Paper No. 7 from *Unified Patents v. Parallel Iron*, Case IPR2013-00639 (PTAB Oct. 15, 2013).

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding.

Respectfully submitted,
Google LLC

Date: January 29, 2024

/Elisabeth Hunt/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on January 29, 2024, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Stephen J. Elliott
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Nathan Lowenstein
Colette Woo
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Date: January 29, 2024

/MacAulay Rush/
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