UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS LLC,
Patent Owner.

Case IPR2024-00215
Patent 10,452,854

PATENT OWNER SECURITY FIRST INNOVATIONS LLC'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF HALEY M. SANDERS UNDER 37 C.F.R. § 42.10(c)

EXHIBIT LIST	
2001	Declaration of Nathan Lowenstein in Support of Motion for *Pro Hac Vice* Admission
2002	Declaration of Colette Woo in Support of Motion for *Pro Hac Vice* Admission
2003	Declaration of Aviel D. Rubin, Ph.D.
2004	Reserved
2005	Bruce Schneier Curriculum Vitae [Schneier-CV]
2006	Bruce Schneier, *Why Cryptography Is Harder Than It Looks*, SCHNEIER ON SECURITY, 1997, https://www.schneier.com/essays/archives/1997/01/why_cryptography_is.html [Schneier-Why-Cryptography-Is-Harder-Than-It-Looks]
2007	Excerpts from Jonathan Katz et al., *Introduction to Modern Cryptography* (1st ed. 2007) [Katz]
2008	Bruce Schneier, *Security Pitfalls in Cryptography*, SCHNEIER ON SECURITY, 1998, https://www.schneier.com/essays/archives/1998/01/security_pitfalls_in.html [Schneier-Security-Pitfalls-in-Cryptography]
2009	Excerpts from Ross Anderson, *Security Engineering: A Guide to Building Dependable Distributed Systems* (1st ed. 2001) [Anderson]
2010	Excerpts from Bruce Schneier, *Applied Cryptography, Second Edition: Protocols, Algorithms, and Source Code in C* (2nd ed. 2015) [Schneier-Applied-Cryptography]
2011	Patent Application Publication to Tsai US 2005/0195857 A1 [Tsai]
2012	Edgar Pek et al., *Formal Verification of Communication Protocols in Distributed Systems*, SYMPOSIUM ON OPERATING SYS. PRINCIPLES, 2003 [Pek]

2013	Jan Friso Groote et al., *A Bounded Retransmission Protocol for Large Data Packets: A Case Study in Computer Checked Algebraic Verification*, 1996 [Groote]
2014	Microsoft, *Overview of MPEG-2 Systems*, WWW.LEARN.MICROSOFT.COM, July 27, 2023, https://learn.microsoft.com/en-us/windows/win32/directshow/overview-of-mpeg-2-systems [Overview-of-MPEG-2-Systems]
2015	Excerpts from Harry Newton, *Newton's Telecom Dictionary* (16th ed. 2000) [Newton's-Telecom-Dictionary]
2016	Excerpts from *Oxford Dictionary of Computing* (1996) [Oxford-Dictionary-of-Computing]
2017	IBM, *Transmission Control Protocol (TCP)*, WWW.IBM.COM, https://www.ibm.com/docs/en/zos-basic-skills?topic=4-transmission-control-protocol-tcp [IBM]
2018	*Security First Innovations, LLC v. Google LLC*, 2:23-cv-00091 (JKW-RJK), Google's Opening Claim Construction Brief (December 6, 2023) [Google's-Opening-Claim-Construction-Brief]
2019	Excerpts from Microsoft Press, *Microsoft Computer Dictionary* (5th ed. 2002) [Microsoft-Computer-Dictionary]
2020	*Security First Innovations, LLC v. Google LLC*, 2:23-cv-00091 (JKW-RJK), Google's Responsive Claim Construction Brief (Jan. 8, 2024) (Non-Confidential Redacted Version) [Google-Responsive-Claim-Construction-Brief]
2021	Cambridge Dictionary, *Set-Top Box*, https://dictionary.cambridge.org/us/dictionary/english/set-top-box (last visited Feb. 27, 2024)

2022	Jim Connors, INFOWORLD, *The evolution of cable television to interactive communications service provider* (Oct. 1, 1996), https://www.infoworld.com/article/2077255/the-evolution-of-cable-television-to-interactive-communications-service-provider.html [InfoWorld]
2023-2027	Reserved
2028	Declaration of Colette Woo [SERVED, NOT FILED]
2029	Jonathan Katz et al., *Introduction to Modern Cryptography* (1st ed. 2007) [SERVED, NOT FILED]
2030	Reserved
2031	Ross Anderson, *Security Engineering: A Guide to Building Dependable Distributed Systems* (1st ed. 2001) [SERVED, NOT FILED]
2032	Bruce Schneier, *Applied Cryptography, Second Edition: Protocols, Algorithms, and Source Code in C* (2nd ed. 2015) (E-Book) [SERVED, NOT FILED]
2033	Second Declaration of Aviel D. Rubin, Ph.D. [Rubin-2nd-Decl.]
2034	Deposition Transcript of Samrat Bhattacharjee [Bhattacharjee-Depo.]
2035	C. Patrikakis et al., *Streaming Content Wars: Download and Play Strikes Back*, UCMedia 2009, LNICST 40, pp. 218–226, 2010. [Patrikakis]
2036	J. Hur et al., *Packet Chunking for File Detection*, IEEE/ACM Transactions on Networking Vol. 31 (2023). [Hur]
2037	R. Li et al., *A Framework for Qualitative Communications Using Big Packet Protocol*, 2019, https://doi.org/10.48550/arXiv.1906.10766. [Li-I]

2038	N. McKeown et al., *The Tiny Tera: A Packet Switch Core*, IEEE Micro 17, 1998. [McKeown]
2039	*Marlin DRM FAQ*, Marlin Community, https://www.marlin-community.com/faq/ (last accessed Sept. 9, 2024) [Marlin-DRM]
2040	*What is Conditional Access?*, Verimatrix anti-piracy (Aug. 1, 2023), https://www.verimatrix.com/anti-piracy/knowledge-base/what-is-conditional-access/ [Verimatrix]
2041	R. Li et al., *New IP: A Data Packet Framework to Evolve the Internet*, 2020, https://www.researchgate.net/publication/341582478 [Li-II]
2042	Vimal Kumar et al., *POP: Privacy and Integrity Preserving Data Aggregation in Wireless Sensor Networks*, PROCEEDINGS OF THE IEEE SYMPOSIUM ON RELIABLE DISTRIBUTED SYSTEMS, September 2013 [Kumar]
2043	Yuxin Mao et al., *A Feedback-Based Secure Path Approach for Wireless Sensor Network Data Collection*, SENSORS, October 22, 2010 [Mao]
2044	Institution Decision in IPR2024-00215 [215-ID]
2045	Second Declaration of Colette Woo [SERVED, NOT FILED]
2046	Second Deposition Transcript of Samrat Bhattacharjee [Bhattacharjee-2nd-Depo.]
2047	Declaration of Haley Sanders in Support of Motion for *Pro Hac Vice* Admission

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Security First Innovations LLC ("Patent Owner") respectfully requests that the Board admit Haley M. Sanders *pro hac vice* in this proceeding as back-up counsel. Patent Owner has met and conferred with Petitioner, and Petitioner does not oppose this motion.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c), 37 C.F.R., provides that:

> 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 showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The Board has further required that a motion for *pro hac vice* admission be filed in accordance with the "Order - Authorizing Motion for *Pro Hac Vice* Admission" entered in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) ("*United Patents* Order").

The *United Patents* Order requires that such motions (1) "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding[,]" and (2) "[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:"

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.;

vi. The individual will be subject to the U.S.P.T.O. Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Haley M. Sanders, submitted herewith as Exhibit 2047, Patent Owner requests the *pro hac vice* admission of Haley M. Sanders in this proceeding:

1. Patent Owner's lead counsel, Stephen J. Elliott, is a registered practitioner (Reg. No. 52,858).

2. Ms. Sanders is an associate at the law firm of Sullivan & Cromwell LLP. EX2047 ¶ 8.

3. The majority of Ms. Sanders's practice has consisted of patent-related matters. *Id*. ¶ 9.

4. Ms. Sanders's experience in post-grant patent proceedings includes drafting patent owner responses. *Id*. ¶ 10. Representative matters where Ms. Sanders is or was actively involved include:

- *AutoStore Sys., Inc. et al.* v. *Ocado Innovation Ltd. et al.* (IPR2022-00673, -00443).

EX2047 ¶ 10.

5. Ms. Sanders has an established familiarity with the subject matter at issue in this proceeding. EX2047 ¶ 13. Ms. Sanders has reviewed the Patent at issue as well as the Petition and the relevant art. *Id*.

6. Ms. Sanders is a member in good standing of the State Bar of New York. *Id*. ¶¶ 1, 2.

7. Ms. Sanders has never been suspended or disbarred from practice before any court or administrative body. *Id*. ¶ 3.

8. No application of Ms. Sanders for admission to practice before any court or administrative body has ever been denied. *Id*. ¶ 4.

9. No sanctions or contempt citations have ever been imposed against Ms. Sanders by any court or administrative body. *Id*. ¶ 5.

10. Ms. Sanders has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R. *Id.* ¶ 6.

11. Ms. Sanders understands that she will be subject to the U.S.P.T.O. Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq*. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* ¶ 7.

12. Ms. Sanders is concurrently applying for *pro hac vice* admission in the following matters:

- *Google LLC v. Security First Innovations LLC* (IPR2024-00212, -00215).

EX2047 ¶ 11.

13. Other than the matters identified in ¶ 12, *supra*, Ms. Sanders has not been previously admitted nor applied to appear *pro hac vice* in any proceeding before the U.S.P.T.O. *Id.* ¶ 12.

IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF HALEY M. SANDERS.

The Board may recognize counsel *pro hac vice* 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. 37 C.F.R. § 42.10(c).

The facts outlined above in the Statement of Facts, and contained in the Declaration of Haley M. Sanders (EX2047), establish that there is good cause to admit Ms. Sanders *pro hac vice* in this proceeding. Patent Owner's lead and first back-up counsel are registered practitioners. Ms. Sanders has experience in post-grant patent proceedings. She also has an established familiarity with the subject matter at issue, including the patents, petitions, and references.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Ms. Sanders *pro hac vice* in this proceeding.

Respectfully submitted,

/s/ Stephen J. Elliott

Stephen J. Elliott (Reg. No. 52,858)
Andrei Iancu (Reg. No. 41,862)
SULLIVAN & CROMWELL LLP

Date: February 12, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

PATENT OWNER SECURITY FIRST INNOVATIONS LLC'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF HALEY M. SANDERS UNDER 37 C.F.R. § 42.10(c)

EXHIBIT 2047

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

Elisabeth H. Hunt	EHunt-PTAB@wolfgreenfield.com
Gregory S. Nieberg	GNieberg-PTAB@wolfgreenfield.com
Nathan R. Speed	nspeed@wolfgreenfield.com

Respectfully submitted,

/s/ *Stephen J. Elliott*

Date: February 12, 2025