

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ORACLE CORPORATION,
Petitioner

v.

JOSEPH L. DEBELLIS,
Patent Owner

Case No.: IPR2024-00221
U.S. Patent No. 6,760,720 B1
Original Issue Date: July 6, 2004

Title: SEARCH-ON-THE-FLY/SORT-ON-THE-FLY SEARCH ENGINE FOR
SEARCHING DATABASES

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10**

LISTING OF EXHIBITS

EX. NO.	DESCRIPTION
1001	U.S. Patent No. 6,760,720 to DeBellis (the “720 Patent”)
1002	Patent Prosecution History for U.S. Patent No. 6,760,720 (the “720 FH”)
1003	Declaration of Dr. Erez Zadok (“Zadok”)
1004	Curriculum Vitae of Dr. Erez Zadok
1005	U.S. Patent No. 5,995,979 to Cochran, Filed Feb. 10, 1998 (“Cochran”)
1006	Mark Newsome et al., <i>HyperSQL: Web-based Query Interfaces for Biological Databases</i> , IEEE Computer Society, Proceedings of The Thirtieth Annual Hawaii International Conference on System Sciences (1997) (“HyperSQL”)
1007	U.S. Patent No. 6,433,797 to Zellweger, Filed July 15, 1999, Claiming Priority to Provisional Application No. 60/095,811, Filed Aug. 4, 1998 (“Zellweger”)
1008	<i>Reserved</i>
1009	<i>Using Microsoft Access 97</i> , Special Edition, by Roger Jennings (1997) (“Microsoft Access”)
1010	Library of Congress Catalog Entry for <i>Using Microsoft Access 97</i> , Special Edition, by Roger Jennings (1997) – Full Catalog Record
1011	Library of Congress Catalog Entry for <i>Using Microsoft Access 97</i> , Special Edition, by Roger Jennings (1997) – MARC Tags
1012	U.S. Patent No. 6,642,946 to Janes, Filed Aug. 12, 1999 (“Janes”)
1013	U.S. Patent No. 6,629,079 to Spiegel, Filed June 25, 1998 (“Spiegel”)

EX. NO.	DESCRIPTION
1014	Declaration of Rachel J. Watters on Authentication of Publication: Mark Newsome et al., <i>HyperSQL: Web-based Query Interfaces for Biological Databases</i> , IEEE Computer Society, Proceedings of The Thirtieth Annual Hawaii International Conference on System Sciences (1997)
1015	Certification From the Library of Congress for <i>Using Microsoft Access 97</i> , Special Edition, by Roger Jennings (1997)
1016	Docket, <i>Vilox Technologies, LLC and Joseph DeBellis v. Oracle Corporation</i> , Case No. 1-23-cv-00302-MN (D. Del.)
1017	Docket, <i>Oracle Corporation v. Vilox Technologies, LLC and Joseph DeBellis</i> , Case No. 1-23-cv-00126-MN (D. Del.)
1018	Docket, <i>Vilox Technologies, LLC v. Salesforce, Inc.</i> , Case No. 3-23-cv-05047-AMO (N.D. Cal.)
1019	Plaintiffs' Amended Complaint For Patent Infringement (Corrected), <i>Vilox Technologies, LLC and Joseph DeBellis v. Oracle Corporation</i> , Case No. 1-23-cv-00302-MN (D. Del. Sept. 11, 2023)
1020	Plaintiff's Original Complaint For Patent Infringement, <i>Vilox Technologies, LLC, et al. v. Salesforce, Inc.</i> , Case No. 6-22-cv-01255-FB (W.D. Tex. Dec. 5, 2022)
1021	Plaintiff's Original Complaint For Patent Infringement, <i>Vilox Technologies, LLC et al. v. Oracle Corporation</i> , Case No. 6-22-cv-01254-FB (W.D. Tex. Dec. 5, 2022)
1022	Letter from Oracle to Costco regarding Costco Request for Indemnity, dated Jan. 20, 2016 [PROTECTIVE ORDER MATERIAL - FILED UNDER SEAL]
1023	Order Re Stipulation of Dismissal Without Prejudice, <i>Vilox Tech., LLC v. Costco Wholesale Corp.</i> , No. 2-15-cv-2019-JRG-RSP (E.D. Tex. Mar. 22, 2016)
1024	<i>Reserved</i>

EX. NO.	DESCRIPTION
1025	<i>Microsoft Computer Dictionary</i> , 4 th ed., Microsoft Press, 1999 (“Microsoft Dictionary”)
1026	<i>4.4BSD Programmer’s Reference Manual</i> , O’Reilly & Associates, Inc., 1994 (“BSD Programmer Manual”)
1027	<i>4.4BSD Programmer’s Supplementary Documents</i> , O’Reilly & Associates, Inc., 1994 (“BSD Supplementary Docs”)
1028	ANSI/ISO/IEC International Standard (IS), Database Language SQL, Part 2: Foundation (SQL/Foundation), International Standards Organization (ISO), 1999 (“SQL Standard”)
1029	<i>Oracle SQL*Plus: The Definitive Guide</i> , by Jonathan Gennick, O’Reilly & Associates, Inc., 1999 (“SQL*Plus Guide”)
1030	<i>ODBC 3.5 Developer’s Guide</i> , by Roger E. Sanders, McGraw-Hill, 1999 (“ODBC Guide”)
1031	<i>Oracle Developer, Guidelines for Building Applications, Release 6.0</i> , September 1998 (“Oracle Building Apps Guide”)
1032	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>

Pursuant to 37 C.F.R. § 42.10, Petitioner Oracle Corporation (“Oracle” or “Petitioner”) respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

I. STATEMENT OF FACTS

Pursuant to 37 C.F.R. § 42.10(c), 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 facts, supported by the accompanying Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission *Pro Hac Vice* (EX1032, “Bobrow Declaration”), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding.

Lead counsel K. Patrick Herman is a registered practitioner.

Jared Bobrow is an experienced litigation attorney. Mr. Bobrow has been a litigating attorney for more than 34 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 32 of those years. *Id.* Mr. Bobrow is a member in good standing of the California State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the First Circuit; California State Supreme Court; the United States District Court for the Eastern District of Texas; and the United States District Courts for the Central, Eastern, Northern and Southern Districts of California. *Id.* ¶¶ 1-4.

Mr. Bobrow has familiarity with the subject matter at issue in this proceeding and in the related district court case: *Vilox Technologies, LLC and Joseph L. DeBellis v. Oracle Corporation*, Case No. 1-23-cv-00302-MN (D. Del.), which was transferred from W.D. Tex. (*Vilox Technologies, LLC, et al. v. Oracle Corporation*, Case No. 6-22-cv-01254-FB (W.D. Tex., filed December 5, 2022)), in which U.S. Patent No. 6,760,720 was asserted by the Patent Owner.¹ Bobrow Declaration ¶ 9.

¹ U.S. Patent No. 6,760,720 is also subject to Oracle's claim for declaratory judgment in the United States District Court for the District of Delaware, *Oracle*

Mr. Bobrow has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of the C.F.R, and he agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Bobrow Declaration ¶¶ 5-6.

II. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Bobrow Declaration, establish that there is good cause to admit Mr. Bobrow *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel is a registered practitioner, Mr. Bobrow is an experienced patent litigation attorney, and Mr. Bobrow has familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

Corporation v. Vilox Technologies, LLC and Joseph L. DeBellis, Case No. 1-23-cv-00126-MN (D. Del.).

Dated: January 4, 2024

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /K. Patrick Herman/

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Patent Owner as detailed below.

<i>Date of Service</i>	January 4, 2024
<i>Manner of Service</i>	Electronic Mail
<i>Documents Served</i>	Petitioner's Motion for Admission <i>Pro Hac Vice</i> of Jared Bobrow Pursuant to 37 C.F.R. § 42.10; Ex. 1032, Declaration of Jared Bobrow In Support of Petitioner's Motion for Admission <i>Pro Hac Vice</i>
<i>Persons Served</i>	Joseph L. De Bellis 282 Edge of Woods Rd. Southampton, NY 11968 josephdebells@gmail.com

/Karen Johnson/

Karen Johnson