

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.
Petitioner

v.

MOTION OFFENSE, LLC
Patent Owner

IPR2024-00287
U.S. Patent No. 11,611,520

**PETITIONER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF GREGORY H. LANTIER
PURSUANT TO 37 C.F.R. § 42.10(c)**

I. STATEMENT OF RELIEF REQUESTED

Petitioner Dropbox, Inc. respectfully requests that the Patent Trial and Appeal Board (“Board”) enter an order granting the *pro hac vice* admission of Gregory H. Lantier as back-up counsel for Petitioner in this proceeding, IPR2024-00287.¹ Petitioner have conferred with counsel for Patent Owner, and Patent Owner does not oppose this motion.

II. APPLICABLE RULES

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.” “[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.” *Id.*

The Board set forth requirements for filing motions for *pro hac vice* admission in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (“Order –

¹ Petitioner is concurrently filing an unopposed motion to admit Gregory H. Lantier as back-up counsel for Petitioner in IPR2024-00286.

Authorizing Motion For Pro Hac Vice Admission – 37 C.F.R. §42.10”) (P.T.A.B. Oct. 15, 2013). A motion seeking *pro hac vice* admission must be filed no sooner than twenty-one (21) days after service of the petition, must contain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding, and must be accompanied by a declaration or affidavit of the individual seeking *pro hac vice* admission. *Id.* at 2–3. The affidavit or declaration must attest to: (1) membership in good standing of the Bar of at least one State or the District of Columbia; (2) no suspensions or disbarments from any practice before any court or administrative body; (3) no application for admission to practice before any court or administrative body ever denied; (4) no sanctions or contempt citations imposed by any court or administrative body; (5) 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.; (6) the individual will be subject to the USPTO 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); (7) all other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and (8) familiarity with the subject matter at issue in the proceeding. *Id.*

III. FACTS DEMONSTRATING GOOD CAUSE FOR THE BOARD TO RECOGNIZE GREGORY H. LANTIER *PRO HAC VICE* DURING THIS PROCEEDING

On January 22, 2024, Petitioner filed a petition for *inter partes* review in IPR2024-00287 directed to U.S. Patent No. 11,611,520 (the “’520 patent”). Petitioner’s lead counsel, Trishan Efram, is a registered practitioner (Registration No. 74,075). Gregory H. Lantier, a partner at Wilmer Cutler Pickering Hale and Dorr LLP, seeks *pro hac vice* admission in this proceeding. Accompanying this motion as Exhibit 1124 is the Declaration of Gregory H. Lantier in Support of Motion for Admission *Pro Hac Vice* (“Lantier Decl.”).

Mr. Lantier is a member of good standing of the Bars of the District of Columbia, the State of Virginia, the State of Wyoming, and the State of New York. *See* Lantier Decl. (EX1124), ¶¶3–4. He has never been suspended or disbarred from practice before any court or administrative body, and he has never been denied admission to practice before any court or administrative body. *See* Lantier Decl. (EX1124), ¶¶5–6. No court or administrative body has ever imposed sanctions or contempt citations on Mr. Lantier. *See* Lantier Decl. (EX1124), ¶7.

Mr. Lantier 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. Mr. Lantier understands that he will be subject to the USPTO 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). *See* Lantier Decl. (EX1124), ¶¶8–9.

Mr. Lantier has appeared *pro hac vice* in the following proceedings before the United States Patent and Trademark Office in the last three years: *PNC Bank, NA. v. USAA*, Case No. IPR2022-00076; *PNC Bank, NA. v. USAA*, Case No. IPR2022-00075; *Medtronic Vascular, Inc. v. TMT Systems, Inc.*, Case. No. IPR2021-01532; *Intel Corp. v. VLSI Tech. LLC*, Case No. IPR2021-01192; *USAA v. PNC Bank, NA.*, IPR2021-01163; *USAA v. PNC Bank, NA.*, IPR2021-01248; *PNC Bank, NA. v. USAA*, IPR2021-01077; *PNC Bank, NA. v. USAA*, Case No. IPR2021-01073; and *PNC Bank, NA. v. USAA*, Case No. IPR2021-01070.² *See* Lantier Decl. (EX1124), ¶10.

As his accompanying declaration demonstrates, Mr. Lantier has an established familiarity with the subject matter at issue in this proceeding. *See* Lantier Decl. (EX1124), ¶¶11–12. Mr. Lantier is an experienced patent litigator with more than twenty years of experience. *See* Lantier Decl. (EX1124), ¶2. Mr. Lantier has

² Motions to admit Gregory H. Lantier as back-up counsel were filed on September 19, 2024 in IPR2024-00275, IPR2024-00276, IPR2024-00277, IPR2024-00278, IPR2024-00279, IPR2024-00280, IPR2024-00282, and IPR2024-00669.

reviewed the '520 patent and its file history, as well as the Petition, Institution Decision, and the exhibits in this proceeding. *See* Lantier Decl. (EX1124), ¶11. Mr. Lantier has been involved in numerous patent litigations and has extensive experience with the USPTO's rules and regulations. *See* Lantier Decl. (EX1124), ¶¶2, 10. Furthermore, Mr. Lantier represents Petitioner in *Motion Offense, LLC v. Dropbox, Inc.*, Case No. 6:23-cv-00303 (W.D. Tex.), the related district court litigation identified in Petitioner's Mandatory Notices. *See* Lantier Decl. (EX1124), ¶12. Mr. Lantier also represents Petitioner in *Motion Offense, LLC v. Dropbox, Inc.*, Case No. 6:20-cv-00251 (W.D. Tex.). Through these litigations, Mr. Lantier developed extensive experience with the subject matter at issue in this proceeding.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Gregory H. Lantier *pro hac vice* in this proceeding.

Respectfully Submitted,

Date: September 25, 2024

/Trishan Efram/

Trishan Efram
Registration No. 74,075
Counsel for Petitioner

UPDATED TABLE OF EXHIBITS

Exhibit	Description
1101	U.S. Patent No. 11,611,520
1102	Declaration of Dr. Todd Mowry
1103	U.S. Patent No. 8,825,597 (“Houston”)
1104	U.S. Patent No. 9,633,125 (“Garcia”)
1105	U.S. Patent Application Publication No. 2010/0005138 (“Manzano”)
1106	U.S. Patent Application Publication No. 2007/0011246 (“Wu”)
1107	U.S. Patent Application Publication No. 2013/0046833 (“Riepling”)
1108	U.S. Patent Application Publication No. 2012/0278404 (“Meisels”)
1109	U.S. Patent Application Publication No. 2013/0067303 (“Kantor”)
1110	[Reserved]
1111	[Reserved]
1112	[Reserved]
1113	<i>Motion Offense, LLC v. Dropbox, Inc.</i> , WDTX-6:20-cv-00251, Jury Verdict Form, May 19, 2023, Dkt. 382
1114	’520 Patent File History
1115	U.S. Patent No. 6,351,776 (“O’Brien”)
1116	U.S. Patent Application Publication No. 2008/0320397 (“Do”)

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U.S. Patent No. 11,611,520

Motion for *Pro Hac Vice* Admission of Gregory H. Lantier

Exhibit	Description
1117	[Reserved]
1118	<i>Motion Offense, LLC v. Dropbox, Inc.</i> , WDTX-6:23-cv-00303, First Amended Complaint for Patent Infringement, July 26, 2023, Dkt. 22
1119	U.S. Patent Application Publication No. 2004/0267705 (“Lemus”)
1120	U.S. Patent No. 6,304,948 (“Motoyama”)
1121	U.S. Patent No. 7,559,088 (“Cohen”)
1122	U.S. Patent Application Publication No. 2003/0182332 (“McBrearty”)
1123	<i>Motion Offense, LLC v. Dropbox, Inc.</i> , WDTX-6:23-cv-00303, Plaintiff’s Disclosure of Preliminary Infringement Contentions, September 20, 2023
1124	Declaration of Gregory H. Lantier

CERTIFICATE OF SERVICE

I hereby certify that, on September 25, 2024, I caused a true and correct copy
of the foregoing materials:

- Petitioner's Unopposed Motion for *Pro Hac Vice* Admission of Gregory H. Lantier Pursuant to 37 C.F.R. § 42.10(c)
- Petitioner's Updated Table of Exhibits
- EX1124

to be served via electronic mail by consent on counsel of record at:

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Respectfully Submitted

/Trishan Efram/

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