

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case No. IPR2024-00557
Patent No. 10,665,067

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

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 10,665,067
1002	Prosecution History of U.S. Patent No. 10,665,067
1003	Declaration of Gregory Welch
1004	CV of Gregory Welch
1005	Plaintiff’s Preliminary Infringement Contentions, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712 (W.D. Wash.) (served Oct. 20, 2023)
1006	Exhibit F to Plaintiff’s Preliminary Infringement Contentions, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712 (W.D. Wash.) (served Oct. 20, 2023)
1007	Amended Joint Status Report and Discovery Plan, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712, Dkt No. 42 (W.D. Wash) (filed Oct. 18, 2023)
1008	U.S. Patent Appl. Publ. No. 2018/0144549 (“Gonzales”)
1009	U.S. Patent Appl. Publ. No. 2016/0274662 (“Rimon”)
1010	U.S. Patent Appl. Publ. No. 2017/0354864 (“Rogers”)
1011	U.S. Patent Appl. Publ. No. 2017/0108930 (“Banerjee”)
1012	U.S. Patent Appl. Publ. No. 2012/0045742 (“Meglan”)
1013	Ronald T. Azuma, “A survey of augmented reality,” <i>Presence: Teleoperators and Virtual Environments</i> , vol. 6, no.4, pp.355 –385, August, 1997 (“Azuma”)
1014	Carmigniani <i>et al.</i> , “Augmented reality technologies, systems and applications,” <i>Multimedia Tools and Applications</i> (2011) 51:341–377, (“Carmigniani”)
1015	Araujo <i>et al.</i> , “An haptic-based immersive environment for shape analysis and modelling,” <i>Journal of Real-Time Image Processing</i> (2010) 5:73–90 (“Araujo”)
1016	U.S. Patent No. 7,812,815 (“Banerjee-815”)

1017	U.S. Patent No. 6,417,638 (“Guy”)
1018	U.S. Patent No. 7,411,576 (“Massie-576”)
1019	U.S. Patent Appl. Publ. No. 2010/0291505 (“Rawley”)
1020	Ronald T. Azuma, “A survey of augmented reality,” <i>Presence: Teleoperators and Virtual Environments</i> , vol. 6, no.4, pp.355-385, August, 1997 (“Azuma-Stamped-Copy”)
1021	U.S. Patent No. 9,563,266 (“Banerjee-266”)
1022	U.S. Patent Appl. Publ. No. 2002/0097223 (“Rosenburg”)
1023	U.S. Patent No. 5,587,937 (“Massie-937”)
1024	U.S. Patent No. 11,127,306 (“Goel”)
1025	U.S. Patent No. 10,172,676 (“Ecabert”)
1026	U.S. Patent Appl. Publ. No. 2018/0335841 (“Rubin”)
1027	U.S. Patent No. 9,881,520 (“Ullrich-520”)
1028	U.S. Patent No. 10,146,335 (“Balan”)
1029	Federal Court Management Statistics (September 2023)
1030	<i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712-TL, Dkt. No. 15 (W.D. Wash. May 18, 2023) (Proof of Service)
1031	<i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712-TL, Dkt. No. 46 (W.D. Wash. Nov. 11, 2023)
1032	U.S. Patent Appl. Publ. No. 2009/0263775 (“Ullrich-775”)
1033	U.S. Patent Appl. Publ. No. 2019/0179426 (“Ojala”)
1034	U.S. Patent No. 10,701,318 (“Valli”)
1035	U.S. Patent Appl. Publ. No. 2018/0050268 (“Jones”)
1036	U.S. Patent No. 10,319,109 (“Murrish”)
1037	U.S. Patent No. 10,803,761 (“Welch”)
1038	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 Valve Corporation respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding, IPR2024-00557. Petitioner is concurrently seeking admission of Mr. Speed *pro hac vice* in related proceeding IPR2024-00556. 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. 1038), 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,
Valve Corporation

Date: June 6, 2024

/Elisabeth Hunt/

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

I certify that on June 6, 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:

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Date: June 6, 2024

/MacAulay Rush/
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