UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC. and FORTINET, INC.,
Petitioners,

v.

INFOEXPRESS INC.,
Patent Owner.

IPR2024-00677
U.S. Patent No. 8,578,444

PETITIONER'S UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION OF KRISHNAN PADMANABHAN UNDER 37 C.F.R. § 42.10

UPDATED EXHIBIT LIST

No.	Exhibit Description
1201	U.S. Patent No. 8,578,444
1202	U.S. Patent No. 8,578,444 File History
1203	Declaration of Henry Hmm, Ph.D
1204	CV of Henry Houh, Ph.D
1205	U.S. Patent Pub. No. 2004/0111520 to Krantz et al
1206	U.S. Patent Pub. No. 2004/0107360 to Herrmann et al
1207	IEEE Std 802.1Q-1998 - IEEE Standard for Local and Metropolitan Area Networks: Virtual Bridged Local Area Networks
1208	U.S. Patent No. 6,430,621 to Srikanth et al.
1209	U.S. Patent No. 6,032,194 to Gai et al.
1210	Cisco IOS 12.0 Switching Services (1999)
1211	Microsoft Computer Dictionary 5th Edition (2002)
1212	Webster's New World Computer Dictionary (2001)
1213	[Reserved]
1214	[Reserved]
1215	[Reserved]
1216	[Reserved]
1217	Wireless security with 802.lx and PEAP (2003)
1218	Declaration of Joseph C. Masullo in Support of Petitioner's Notice of Intent to Designate Joseph C. Masullo as a Provisionally Recognized PTAB Attorney Eligible for Automatic

	Pro HacVice Admission as Backup Counsel
1219	Declaration of Krishnan Padmanabhan in Support of Petitioner's Unopposed Motion for *Pro Hac Vice* Admission

Pursuant to 37 C.F.R. § 42.10 and the authorization provided by the United States Patent and Trademark Office's Patent Trial and Appeal Board ("Board") in Paper Number 4, dated April 17, 2024 ("the Notice"), Cisco Systems, Inc., ("Petitioner"), submits this motion for Krishnan Padmanabhan to appear *pro hac vice*. Petitioners have conferred with Patent Owner regarding this Motion, and Patent Owner has confirmed that they will not oppose this motion.

Petitioner respectfully requests that the Board recognize Mr. Padmanabhan as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so as shown below.

I. STATEMENT OF FACTS

A. Krishnan Padmanabhan

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Padmanabhan *pro hac vice*.

Lead counsel for Petitioner, Scott M. Border, is a registered practitioner (Reg. No. 77,744).

Mr. Padmanabhan is a litigation attorney who has been involved in multiple patent infringement cases in federal district courts. Ex. 1219 ¶ 7. He has experience in various aspects of patent infringement matters and has participated in multiple patent cases in federal courts, including trials and claim construction hearings. *Id*.

Mr. Padmanabhan is a member in good standing of the Bars of the State of

New York and California. *Id*. ¶ 1.

Mr. Padmanabhan has never been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. *Id*. at ¶ 2-4.

Mr. Padmanabhan has obtained substantial familiarity with the involved patent, the prior art, and various issues raised in this proceeding. *Id*. ¶ 7. Moreover Mr. Padmanabhan has reviewed the involved patent, the Petition, the prior art, and all other cited materials. Given his extensive patent litigation experience and his familiarity with the instant Petition, the cited materials, and the patented technology, Mr. Padmanabhan has established familiarity with the subject matter at issue in this proceeding. *Id*.

Mr. Padmanabhan 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 37 C.F.R. and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. §11.19(a). *Id*. ¶¶ 5-6.

Given Mr. Padmanabhan's familiarity with the subject matter at issue in this proceeding, Petitioner respectfully submits that it has shown good cause for the Board to recognize Mr. Padmanabhan as counsel pro hac vice during this proceeding.

This Motion is accompanied by the Declaration of Mr. Padmanabhan. Ex. 1219.

Dated: April 22, 2025

Respectfully Submitted,

/Scott M. Border/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that on April 22, 2025, I caused to be served a true and correct copy of the foregoing and any accompanying exhibit to be served via e-mail on the following counsel for Patent Owner:

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Dated: April 22, 2025

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