UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

X1 DISCOVERY, INC.,
Patent Owner

IPR2025-00253
U.S. Patent No. 7,370,035

PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF NATASHA E. DAUGHTREY UNDER 37 C.F.R. § 42.10(c)

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

EXHIBIT LIST

Exhibit No.	Description of Document
2001	Declaration of Mr. Martin Haeberli, dated April 28, 2025
2002	CV of Mr. Martin Haeberli
2003	Revised Stipulation to Stay, *X1 Discovery, Inc. v. Microsoft Corp.*, No. 8:23-cv-02415 (C.D. Cal. Feb 29, 2024), ECF No. 52
2004	Order Granting Revised Stipulation to Stay, *X1 Discovery, Inc. v. Microsoft Corp.*, No. 8:23-cv-02415 (C.D. Cal. Mar. 1, 2024), ECF No. 53
2005	Joint Status Report, *X1 Discovery, Inc. v. Microsoft Corp.*, No. 8:23-cv-02415 (C.D. Cal. Mar. 12, 2025), ECF No. 57
2006	Minutes of Status Conference, *X1 Discovery, Inc. v. Microsoft Corp.*, No. 8:23-cv-02415 (C.D. Cal. Mar. 12, 2025), ECF No. 59
2007	Excerpt of the Initial Determination Granting-In-Part Respondents' Motion for Summary Determination, Certain Computing Devices Utilizing Indexed Search Systems and Components Thereof, ITC-337-TA-1389, at 14 (Sept. 3, 2024)
2008	Excerpt of the Initial Determination of Violation of Section 337 and Recommended Determination on Remedy and Bond , Certain Computing Devices Utilizing Indexed Search Systems and Components Thereof, ITC-337-TA-1389, at 31-32 (Feb. 26, 2025)
2009	Email from counsel for Microsoft to counsel for X1 regarding Sotera stipulation, Apr. 18, 2025
2010	Information Disclosure Statement for US 12/328,410 dated Dec. 4, 2008 and filing receipt
2011	Information Disclosure Statement for US 11/108,335 dated June 26, 2008

Exhibit No.	Description of Document
2012	Information Disclosure Statement for US 15/199,928 dated June 30, 2016 (now U.S. Patent No. 10,897,443)
2013	Office Action for US 11/128,397 dated May 18, 2007
2014	Office Action for US 11/108,479 dated March 24, 2008
2015	Office Action for US 11/771,554 dated Dec. 23, 2009 (now U.S. Patent No. 8,533,176)
2016	Office Action for US 12/786,246 dated Jan. 10, 2012
2017	Office Action for US 13/918,306 dated June 24, 2015
2018	Information Disclosure Statement for US 15/012,684 dated Feb. 1, 2016 (now U.S. Patent No. 10,546,030) and filing receipt
2019	***Reserved***
2020	Supplemental Declaration of Martin P. Haeberli
2021	Transcript from the Deposition of Dr. Loren Terveen, dated October 21, 2025
2022	Dan Cosley et al., *SuggestBot: Using Intelligent Task Routing to Help People Find Work in Wikipedia*, Proceedings of the 12th International Conference on Intelligent User Interfaces (2007), marked as Exhibit 1 at the Deposition of Dr. Loren Terveen
2023	Declaration of Dr. Loren G. Terveen from *Microsoft Corp. V. X1 Discovery, Inc.*, IPR2025-00254, Ex. 1003
2024	Windows XP Home Edition System Requirements (2001)

Exhibit No.	Description of Document
2025	Declaration of Natasha E. Daughtrey in Support of Motion for *Pro Hac Vice* Admission Under 37 C.F.R. § 42.10(c)

Pursuant to 37 C.F.R. §42.10(c) Patent Owner X1 Discovery, Inc. ("X1") respectfully requests that the Board allow Natasha E. Daughtrey to appear *pro hac vice* on its behalf in this proceeding, IPR2025-00253 regarding U.S. Patent No. 7,370,035 ("the '035 patent").

I. THE REQUEST IS TIMELY

Pursuant to the Board's "Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response," dated January 27, 2025 (Paper No. 5), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. §42.10(c), X1 respectfully requests that the Board allow Natasha E. Daughtrey to appear *pro hac vice* on its behalf in this proceeding. Counsel for Petitioner does not oppose the relief requested in this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37 C.F.R. § 42.10(c), X1 has demonstrated good cause to admit Ms. Daughtrey *pro hac vice* in this proceeding. In particular, X1's lead counsel is a registered practitioner, and Ms. Daughtrey is an experienced litigating attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty one days after service of the petition; includes a statement of facts showing good cause for the Board to recognize Ms. Daughtrey *pro hac vice*; and is being filed concurrently

with Exhibit 2025, the Declaration of Natasha E. Daughtrey in Support of Patent Owner's Motion for *Pro Hac Vice* Admission under 37 C.F.R. § 42.10(c) ("Daughtrey Declaration"), all in accordance with to the Board's "Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response," dated January 27, 2025 (Paper No. 5) and the "Order Authorizing Motion for *Pro Hac Vice* Admission" in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 at 3 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c)(1) provides that "[t]he 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."

2. Lori A. Gordon, lead counsel for X1 in this proceeding, is a registered practitioner holding Registration No. 50,633.

3. As set forth in the Daughtrey Declaration, Ms. Daughtrey is an experienced litigating attorney. Specifically, Ms. Daughtrey has been litigating

patent cases for over 14 years. Ms. Daughtrey has been practicing law since 2011 and has extensive experience litigating patent infringement cases in district courts across the United States. Ms. Daughtrey's experience in patent litigation matters includes examining non-expert and expert witnesses and arguing Markman hearings, patent dispositive motion proceedings, and representing clients in other patent-related hearings and pleadings concerning, *inter alia*, patent validity and infringement issues. (Daughtrey Declaration ¶¶ 2-4.)

4. Ms. Daughtrey also has an established familiarity with the precise subject matter at issue in this proceeding. In the course of this representation, she has developed a strong familiarity with the '035 patent, its prosecution history, the general subject matter to which the '035 patent is directed, and the prior art references relied upon by the Petitioners. (Daughtrey Declaration ¶ 6.) Additionally, Ms. Daughtrey has thoroughly reviewed the Petition and accompanying Exhibits submitted in this proceeding. *Id*.

5. Ms. Daughtrey has attested to each of the requirements set forth in to the Board's "Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response," dated January 27, 2025 (Paper No. 5) and paragraph 2(b)(i)-(viii) of the "Order Authorizing Motion for *Pro Hac Vice* Admission" in Case IPR2013-00639, Paper 7, at 3. (Daughtrey Declaration ¶¶ 7-11).

6. The Commissioner is hereby authorized to charge all fees due in connection with this *pro hac vice* application to Attorney Deposit Account 506989.

IV. CONCLUSION

In view of the foregoing, X1 respectfully submits that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and request an Order permitting Natasha E. Daughtrey to appear *pro hac vice* on its behalf in this proceeding.

Dated: January 7, 2026

Respectfully submitted,

/Lori A. Gordon/

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

A copy of this Patent Owner's Motion for Pro Hac Vice Admission of Natasha E. Daughtrey under 37 C.F.R. § 42.10(c) has been served on Petitioner's attorneys of record as follows via electronic mail:

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Date: January 7, 2026 /Lori A. Gordon/

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