

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FUBOTV MEDIA INC., YANKA INDUSTRIES, INC., WEBGROUP
CZECH REPUBLIC, A.S., and NKL ASSOCIATES, S.R.O.,¹
Petitioner

v.

DISH TECHNOLOGIES L.L.C.,
Patent Owner

IPR2024-00919

U.S. Patent 8,868,772 B2

¹ Webgroup Czech Republic, A.S. and NKL Associates, S.R.O. filed petitions in IPR2025-00347 and -00348 and have been joined as parties to IPR2024-00918 and -00919, respectively.

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioners WebGroup Czech Republic, A.S. and NKL Associates, S.R.O. (collectively, “WebGroup/NKL”), requests that the Board admit Jaime F. Cardenas-Navia *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

In accordance with 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. “[W]here lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigation attorney and has an established familiarity with the subject matter at issue in the proceeding.” § 42.10(c). The facts, supported by the attached Declaration of Jaime F. Cardenas-Navia in Support of Motion for Admission *Pro Hac Vice* (EX1065), here establish good cause for the Board to recognize Jaime F. Cardenas-Navia *pro hac vice* during this proceeding.

1. Lead counsel, Naveed Hasan, is a registered practitioner.
2. Counsel, Jaime F. Cardenas-Navia, is a partner at the law firm of Reichman Jorgensen Lehman & Feldberg LLP.
3. Mr. Cardenas-Navia is an experienced litigator with substantial experience in patent litigation. Mr. Cardenas-Navia has been practicing in the field

of intellectual property law, and particularly, patent litigation, for over ten years.

EX1065, Cardenas-Navia Decl., ¶ 1. In particular, he has been in private practice and litigating patent cases since August 2014. He has been counsel in over a dozen patent infringement cases and has represented clients in at least five United States District Courts. *Id.* at ¶ 3. Before law school, Mr. Cardenas-Navia worked as a Patent Examiner at the United States Patent and Trademark Office for three years. *Id.* at ¶ 1.

4. Mr. Cardenas-Navia is a member in good standing of the Bar of the State of New York and is admitted to practice before the United States District Courts for the Southern District of New York and Northern District of Illinois and United States Court of Appeals for the Federal Circuit. *Id.* at ¶ 2. In the past five (5) years, he has appeared *pro hac vice* in the following proceedings before the United States Patent and Trademark Office: IPR2020-00276, IPR2022-01086, IPR2023-00628, IPR2023-00630, IPR2023-00628, IPR2023-00630, IPR2023-00891, IPR2023-00923 and IPR2023-00924. *Id.* at ¶ 7.

5. Mr. Cardenas-Navia is familiar with the subject matter at issue in this proceeding, including the patent, its prosecution history, and the identified references. *Id.* at ¶ 8. He is counsel in the following case, which is related to and involves the same patent at issue in this proceeding: *Dish Technologies LLC et al. v. WebGroup Czech Republic, A.S. et al.*, No. 2:23-cv-00553-RJS-JCB (D. Utah). *Id.*

6. Mr. Cardenas-Navia has never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body, nor has any court or administrative body deny his application for admission to practice. *Id.* at ¶ 4. He has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R. *Id.* at ¶ 5. He agrees to be subject to the United States Patent and Trademark Office 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). *Id.* at ¶ 6.

III. Conclusion

For the foregoing reasons, WebGroup/NKL respectfully requests that the Board admit Jaime Cardenas-Navia *pro hac vice* in this proceeding.

Dated: August 14, 2025

Respectfully submitted,

/s/ James M. Glass
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Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 14, 2025 a copy of the foregoing document was served by email upon the following:

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Andrew Wilson (Reg. No. 74,093)
Jamie R. Lynn (Reg. No. 63,666)
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Patent 8,868,772

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IPR2024-00918

U.S. Patent 8,868,772 B2

**DECLARATION OF JAIME F. CARDENAS-NAVIA
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

¹ Webgroup Czech Republic, A.S. and NKL Associates, S.R.O. filed petitions in IPR2025-00347 and -00348 and have been joined as parties to IPR2024-00918 and -00919, respectively.

I, Jaime F. Cardenas-Navia, declare as follows:

1. I have been practicing law in the field of intellectual property, and particularly, patent litigation, for over ten years. Before attending law school, I worked as a Patent Examiner at the United States Patent & Trademark Office for three years (August 2007 – August 2010).

2. I am a member in good standing of the Bar of the State of New York and am admitted to practice before the United States District Courts for the Southern District of New York and Northern District of Illinois and United States Court of Appeals for the Federal Circuit.

3. I have been in private practice and litigating patent cases since August 2014. I have been counsel in over a dozen patent infringement cases and have represented clients in at least five United States District Courts.

4. I have never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body, nor had any court or administrative body deny my application for admission to practice.

5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R.

6. I agree to be subject to the United States Patent and Trademark Office 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).

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7. In the past five (5) years, I have appeared *pro hac vice* in the following proceedings before the United States Patent and Trademark Office IPR2020-00276, IPR2022-01086, IPR2023-00628, IPR2023-00630, IPR2023-00628, IPR2023-00630, IPR2023-00891, IPR2023-00923, and IPR2023-00924.

8. I am familiar with the subject matter at issue in this proceeding, including the patent, its prosecution history, and the identified references. I am counsel in the following case, which is related to and involves the same patent at issue in this proceeding: *Dish Technologies LLC et al. v. WebGroup Czech Republic, A.S. et al.*, No. 2:23-cv-00553-RJS-JCB (D. Utah).

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of U.S. Patent No. 8,868,772.

Dated: August 14, 2025

Respectfully submitted,

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Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 14, 2025 a copy of the foregoing document was served by email upon the following:

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