Paper 6
Filed: March 20, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STINGRAY GROUP INC. AND STINGRAY MUSIC USA, INC.,
PETITIONERS,

v.

EDWIN A. HERNANDEZ-MONDRAGON,
PATENT OWNER.

CASE IPR2025-00350
PATENT 10,524,002

PETITIONERS' NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY MICHAEL D. MCBRIDE AS BACKUP COUNSEL[1]

37 C.F.R. § 42.10(c)

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[1] The Board authorized Petitioners to file this notice in the Notice of Filing Date Accorded to Petition. Paper 3 at 3–6.

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CURRENT EXHIBIT LIST

No.	Brief Description
1001	U.S. Patent No. 10,524,002
1002	File History of U.S. Patent No. 10,524,002
1003	U.S. Patent No. 8,954,600
1004	U.S. Patent Application Publication No. 2014/0150019
1005	"Java Programming 24-Hour Trainer", Yakov Fain
1006	U.S. Patent Application Publication No. 2004/0031052
1007	Declaration of Stuart Lipoff including *Curriculum Vitae*
1008	Declaration of June Munford including *Curriculum Vitae*
1009	U.S. Patent No. 10,123,074
1010	File History of U.S. Patent No. 10,123,074
1011	U.S. Patent Application Publication No. 2014/0068690
1012	Second Amended Complaint from related litigation, Case No. 1:24-cv-21226
1013	P.A. Sarginson, "MPEG-2: a tutorial introduction to the systems layer," IEE Colloquium on MPEG-2 – What it is and What it isn't, London, UK, 1995, pp. 4/1-4/13
1014	Declaration of Michael D. McBride in Support of Petitioners' Notice of Intent to Designate Provisionally Recognized Attorney Michael D. McBride as Backup Counsel

I. INTRODUCTION

Per 37 C.F.R. § 42.10(c)(2) and permission of the Board, Stingray Group Inc. and Stingray Music USA, Inc., ("Petitioners") gives this notice of their intent to designate provisionally recognized attorney Michael D. McBride ("Mr. McBride") as backup counsel. The facts set forth below and the accompanying Declaration of Mr. McBride, Ex. 1014 ("McBride Decl."), support his *pro hac vice* admission.

II. STATEMENT OF FACTS SHOWING THERE IS GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THE PROCEEDING

A. Identity of the Registered Practitioner Who Will Serve as Lead Counsel

Masood Anjom is a registered practitioner (Reg. No. 62,167) who is currently serving, and will continue to serve, as lead counsel for Patent Owner. *See* Paper1, at 5.

B. The Most Recent Prior Proceeding in Which the Person Seeking to Appear Was Recognized *Pro Hac Vice* by Order of the Patent Trial and Appeal Board Pursuant to a Motion of the Type Described in 37 C.F.R. §42.10(c)(1)

The most recent prior proceeding in which Mr. McBride sought to appear and was recognized *pro hac vice* by order of the PTAB pursuant to a motion was *AT&T Mobility LLC v. Daingean Techs. Ltd.*, IPR2024-00644 (PTAB). *See* Paper 6, June 18, 2024, Motion for PHV of Michael McBride, and Paper 7, ORDER Granting Patent Owner's Motion for Admission *Pro Hac Vice* of Michael McBride 37 C.F.R. § 42.10. McBride Decl. ¶3.

C. Requirements Enumerated in "Order Authorizing Motion for *Pro Hac Vice* Admission" in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (PTAB Oct. 15, 2013) (Representative)

Mr. McBride is a member in good standing of the bar of at least one state or the District of Columbia, specifically, Texas. McBride Decl. ¶4.

Mr. McBride has not been suspended or disbarred from practice before any court or administrative body. *Id.* ¶5.

No court or administrative body has ever denied Mr. McBride's application for admission to practice. *Id.* ¶6.

No court or administrative body has ever sanctioned or imposed contempt citations on Mr. McBride. *Id.* ¶7.

Mr. McBride has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 CFR part 42. *Id.* ¶8.

Mr. McBride agrees that he is subject to the USPTO Rules of Professional Conduct set forth in 37 CFR § 11.101 *et seq.* and disciplinary jurisdiction under 37 CFR § 11.19(a). *Id.* ¶9.

The proceedings before the Office for which Mr. McBride has applied to appear *pro hac vice* where the Board granted the motion in the last three years are:

- *AT&T Mobility LLC et al. v. Daingean Techs. Ltd.*, IPR2024-00644, PHV Motion filed June 18, 2024 (Paper 6), granted July 10, 2024 (Paper 7)

- *AT&T Mobility LLC et al. v. Daingean Technologies. Ltd.*, IPR2024-00402, PHV Motion filed March 20, 2024 (Paper 9), granted May 21, 2024 (Paper 11)
- *AT&T Mobility LLC et al. v. Daingean Technologies Ltd.*, IPR2024-00310, PHV Motion filed Mar. 26, 2024 (Paper 6), granted May 20, 2024 (Paper 7)

Id. ¶10.

The proceeding before the Office for which Mr. McBride has applied to appear *pro hac vice* where the Board never issued a decision on the motion in the last three years is:

- *AT&T Mobility LLC et al v. Daingean Technologies. Ltd.*, IPR2024-00510, PHV Motion filed Mar. 20, 2024 (Paper 6)

Id. ¶11.

The proceedings before the Office for which Mr. McBride was listed in a mandatory notices as anticipated to appear *pro hac vice* but where a PHV motion was not or has not yet been filed in the last three years are:

- *Nokia of America et al. v. Iarnach Technologies Ltd.*, IPR2024-00899, filed June 20, 2024 (Paper 5)
- *AT&T Mobility LLC et al. v. Daingean Technologies Ltd.*, IPR2024-00730, filed Apr. 8, 2024 (Paper 3)

- *Nokia of America et al. v. Iarnach Technologies Ltd.*, IPR2024-00900, filed June 20, 2024 (Paper 5)

Id. ¶12.

The proceeding before the Office for which Mr. McBride was deemed admitted PHV following a Notice of Intent to Designate Provisionally Recognized PTAB Attorney Michael D. McBride as Backup Counsel in the last three years is:

- *Google LLC et al. v. Nariste Networks Pty. Ltd.*, IPR2023-04374 (Papers 21–22)

Id. ¶13.

Mr. McBride is concurrently filing a Notice of Intent to Designate Provisionally Recognized PTAB Attorney Michael D. McBride as Backup Counsel in the following related cases:

- *Stingray Group Inc. et al. v. Edwin A. Hernandez-Mondragon*, IPR2025-00349

Id. ¶14.

Mr. McBride has legal familiarity with the subject matter at issue in the proceeding. *Id.* ¶¶2, 15–16.

III. CONCLUSION

Upon being deemed admitted *pro hac vice* under 37 C.F.R. § 42.10(c)(2)(iii), Petitioners will file updated mandatory notices identifying Mr. McBride as counsel

of record. And Mr. McBride will keep the Board informed of sanctions, changes to good standing at a bar, or any other event that renders materially inaccurate or incomplete any representation that he made to the Board in connection with this request for *pro hac vice* notice. McBride Decl. ¶17.

Dated: March 20, 2025

Respectfully submitted,

/s/ Masood Anjom

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CERTIFICATE OF SERVICE

The undersigned certifies that on the twentieth day of March 20, 2025, a complete and entire copy of the foregoing "PETITIONERS' NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY MICHAEL D. MCBRIDE AS BACKUP COUNSEL" including exhibits, if any, was served on the date below on the following counsel of record via email per Patent Owner's consent to electronic service.

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