

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DRAFTKINGS INC.
Petitioner

v.

WINVIEW IP HOLDINGS, LLC
PATENT OWNER

IPR2026-00140
U.S. Patent No. 11,451,883

**PETITIONER'S UNOPPOSED MOTION FOR
ADMISSION *PRO HAC VICE* OF ANDREW J. DANFORD
PURSUANT TO 37 C.F.R. § 42.10(c)**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 4, Petitioner (“DraftKings”) requests that the Patent Trial and Appeal Board (the “Board”) admit Andrew J. Danford *pro hac vice* in this proceeding, IPR2026-00140. The parties have conferred, and the Patent Owner does not oppose this motion.

II. APPLICABLE RULES

Pursuant to 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.” “[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.” *Id.*

The PTAB set forth requirements for filing motions for *pro hac vice* admission in *Unified Patents, Inc. v. Parallel Iron, LLC*, Case IPR2013-00639, Paper 7 (“Order – Authorizing Motion For Pro Hac Vice Admission – 37 C.F.R. §42.10”) (PTAB Oct. 15, 2013). A motion seeking *pro hac vice* admission must be filed no sooner than twenty-one (21) days after service of the petition, must contain a statement of

facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding, and must be accompanied by a declaration or affidavit of the individual seeking pro hac vice admission. *Id.* at 2-3. The affidavit or declaration must attest to: (1) membership in good standing of the Bar of at least one State or the District of Columbia; (2) no suspensions or disbarments from any practice before any court or administrative body; (3) no application for admission to practice before any court or administrative body ever denied; (4) no sanctions or contempt citations imposed by any court or administrative body; (5) the individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.; (6) the individual will be subject to the USPTO 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); (7) all other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and (8) familiarity with the subject matter at issue in the proceeding. *Id.*

III. STATEMENT OF FACTS DEMONSTRATING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THIS PROCEEDING

Patent Owner's lead counsel, John Hobgood, is a registered practitioner

(Registration No. 61,540). Second backup counsel, Zachary Nemtzow, is also a registered practitioner (Registration No. 81,444). Andrew J. Danford, a partner at Wilmer Cutler Pickering Hale and Dorr LLP, seeks *pro hac vice* admission in this proceeding. Accompanying this motion as Exhibit 1058 is the Declaration of Andrew J. Danford in Support of Motion for Admission *Pro Hac Vice* (“Danford Decl.”).

Mr. Danford is a member of good standing of the Bars of the Commonwealth of Massachusetts and the State of New York. *See* Danford Decl. ¶4 (Ex. 1060). He has never been suspended or disbarred from practice before any court or administrative body, and he has never been denied admission to practice before any court or administrative body. *See* Danford Decl. ¶¶9-10 (Ex. 1060). No court or administrative body has ever imposed sanctions or contempt citations on Mr. Danford. *See* Danford Decl. ¶9 (Ex. 1060).

Mr. Danford has read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials set forth in part 42 of 37 C.F.R. Mr. Danford understands that he will be subject to the USPTO 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). *See* Danford Decl. ¶¶11-12 (Ex. 1060).

As his accompanying declaration demonstrates, Mr. Danford has an established

familiarity with the subject matter at issue in this proceeding. Mr. Danford is an experienced patent litigator with more than fifteen years of experience. *See* Danford Decl. ¶3 (Ex. 1060). Mr. Danford has reviewed the '883 patent and its file history, as well as the Papers, and the Exhibits in this proceeding. *See* Danford Decl. ¶8 (Ex. 1060).

IV. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Board admit Andrew J. Danford *pro hac vice* in this proceeding.

Respectfully submitted,

Date: September 10, 2026

/Trishan Efram/
Trishan Efram, Reg. No. 74,075

PETITIONER’S UPDATED TABLE OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,451,883
1002	Declaration of Dr. Chatterjee
1003	U.S. Patent Application Publication No. 2004/0242322 to Montagna (“Montagna”)
1004	U.S. Patent No. 7,465,231 to Lewin (“Lewin”)
1005	[Reserved]
1006	U.S. Patent No. 6,832,230 to Zilliacus (“Zilliacus”)
1007	U.S. Patent No. 6,853,973 to Mathews (“Mathews”)
1008	[Reserved]
1009	[Reserved]
1010	File History of U.S. Patent No. 11,451,883
1011	U.S. Patent Application Publication No. 2003/0228866 (“Pezeshki”)
1012	Microsoft Computer Dictionary, 5th ed., 2002 (relevant sections)
1013-1021	[Reserved]
1022	James W. Cortada, <i>How the IBM PC Won, Then Lost, the Personal Computer Market</i> , IEEE Spectrum (July 21, 2021), https://spectrum.ieee.org/how-the-ibm-pc-won-then-lost-

Exhibit	Description
	the-personal-computer-market (last visited Nov. 12, 2025)
1023	<i>Timeline of Computer History: 1984</i> , Computer History Museum, https://www.computerhistory.org/timeline/1984/ (last visited Nov. 12, 2025)
1024	Eskandari Abdi, <i>From Dial-up to Fiber Optic: The Evolution of the Internet</i> , 14 J. Mass Commc’n Journalism 595 (2024), https://www.hilarispublisher.com/open-access/from-dialup-to-fiber-optic-the-evolution-of-the-internet.pdf (last visited Nov. 12, 2025)
1025	<i>A history of mobile phones</i> , BBC, https://www.bbc.co.uk/bitesize/articles/z62gjfr# (last visited Nov. 12, 2025)
1026	<i>Blackberry Connection</i> , Blackberry https://www.blackberry.com/news/connection/200201.shtml (last visited Nov. 12, 2025)
1027	Ivica Crnkovic, <i>Component-based Software Engineering – New Challenges in Software Development</i> , J. Computing and Info. Tech. 151 (2003), available at https://scispace.com/pdf/component-based-software-engineering-new-challenges-in-5bcdjbyh7r.pdf (last visited Nov. 12, 2025)
1028	Richard Baguley, <i>The Gadget We Miss: The Nokia 9000 Communicator</i> , Medium (Aug. 1, 2013), https://medium.com/people-gadgets/the-gadget-we-miss-thenokia-9000-communicator-ef8e8c7047ae (last visited Nov. 12, 2025)
1029	<i>Nokia 9000 Communicator</i> , Mobile Phone Museum, https://www.mobilephonemuseum.com/phone-detail/nokia-9000-

Exhibit	Description
	communicator (last visited Nov. 12, 2025)
1030	Matt Shipman, <i>Tracing the History of Mobile Games</i> , NC State (Jan. 28, 2021), https://news.ncsu.edu/2021/01/tracing-the-history-of-mobile-games/ (last visited Nov. 12, 2025)
1031	Ayla Angelos, <i>Snake by Nokia</i> , It's Nice That (February 23, 2021), https://www.itsnicethat.com/features/taneli-armanto-the-history-of-snake-design-legacies-230221 (last visited Nov. 12, 2025)
1032	<i>All About the Snake Game: From Arcades to Mobiles and Beyond</i> , https://www.snakegame.net/about-snake (last visited Nov. 13, 2025)
1033	Tim Larimer, Time Magazine (Mar. 5, 2001), <i>Internet A La I-Mode</i> , available at https://content.time.com/time/subscriber/article/0,33009,999355,00.html (last visited Nov. 12, 2025)
1034	Bram Cohen, <i>Incentives Build Robustness in BitTorrent</i> (May 22, 2003), available at https://web.archive.org/web/20050128112626/http://bittorrent.com/bittorrentecon.pdf (last visited Nov. 21, 2025)
1035	Bitcomet, https://community.ccleaner.com/t/bitcomet-pc-not-shuting-down/736 (last visited Nov. 20, 2025)
1036	Paul Kryzyanowski, <i>Lectures on distributed systems: Client-server communication</i> , Rutgers University (1999), https://formations.telecom-bretagne.eu/syst/TPDIST/Additional-Reading/07-networking-client-server.pdf (last visited Nov. 12, 2025)
1037	Notice of Petitioner's <i>Sotera</i> Stipulation ("Stipulation")

Exhibit	Description
1038	[Reserved]
1039	[Reserved]
1040	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 79 (D.N.J. July 11, 2025) (“WinView I First Dismissal”)
1041	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 128 (D.N.J. Mar. 17, 2026) (“WinView I Second Dismissal”)
1042	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:25-cv-01143, Dkt. No. 58 (D.N.J. Jan. 21, 2026) (“WinView II Stay”)
1043	Engine Media Holdings, Inc. (Form 20-F) (Dec. 29, 2022) (“Engine Media Disclosure”)
1044	Assignment from WinView, Inc. to WinView IP Holdings, LLC (“WinView IP Holdings Assignment”)
1045	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 1 (D.N.J. July 7, 2021) (“WinView I Complaint”)
1046	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 7 (D.N.J. July 28, 2021) (“WinView I Amended Complaint”)
1047	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:25-cv-01143, Dkt. No. 61 (D.N.J. Mar. 9, 2026) (“Petitioner De Bene Esse Deposition Letter”)
1048	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-

Exhibit	Description
	013405, Dkt. No. 63 (D.N.J. Nov. 12, 2024) (“WinView Stay Letter”)
1049	Reproduction of WinView patent families, produced with data from USPTO Patent Center (“WinView Families”)
1050	WinView patent continuity data sourced from USPTO Patent Center
1051	U.S. Patent No. 9,233,293 status sourced from USPTO Patent Center (“’293 Patent Status)
1052	U.S. Patent No. 9,314,686 status sourced from USPTO Patent Center (“’686 Patent Status)
1053	U.S. Patent No. 9,314,701 status sourced from USPTO Patent Center (“’701 Patent Status)
1054	U.S. Patent No. 9,652,937 status sourced from USPTO Patent Center (“’937 Patent Status)
1055	U.S. Patent No. 9,501,904 status sourced from USPTO Patent Center (“’904 Patent Status)
1056	U.S. Patent No. 10,556,183 status sourced from USPTO Patent Center (“’183 Patent Status)
1057	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 67 (D.N.J. Dec. 16, 2024) (“WinView I Stipulation”)
1058	<i>WinView IP Holdings, LLC v. DraftKings Inc.</i> , No. 3:21-cv-013405, Dkt. No. 84 (D.N.J. Aug. 11, 2025) (“WinView I Third

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Exhibit	Description
	Amended Complaint”)
1059	Certificate of Formation of WinView IP Holdings, LLC (June 20, 2023) (“WinView IP Holdings Formation”)
1060	Declaration of Andrew J. Danford in Support of Motion for Admission <i>Pro Hac Vice</i>
1061	Declaration of Jeremy M. Brunner in Support of Motion for Admission <i>Pro Hac Vice</i>

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on September 10, 2026, a complete and entire copies of the following documents:

- Petitioner's Unopposed Motion for *Pro Hac Vice* Admission of Andrew. J. Danford Pursuant to 37 C.F.R. §§ 42.10(c)
- Petitioner's Unopposed Motion for *Pro Hac Vice* Admission of Jeremy M. Brunner Pursuant to 37 C.F.R. §§ 42.10(c)
- Petitioner's Updated Table of Exhibits
- Exhibit 1060
- Exhibit 1061

were served via electronic service to Patent Owner's counsel at the following email addresses:

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Date: September 10, 2026

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