

Filed on behalf of TQ Delta LLC

By: Peter J. McAndrews

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DISH NETWORK L.L.C.

Petitioner

v.

TQ DELTA LLC

Patent Owner

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Case IPR2016-01470

Patent No. 8,611,404

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**PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION**  
**UNDER 37 C.F.R. § 41.10(c)**

Patent Owner, TQ Delta LLC, respectfully requests that the Board recognize Rajendra A. Chiplunkar, Esq., as counsel *pro hac vice* during this proceeding.

## **I. BACKGROUND**

Patent Owner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the "Order—Authorizing Motion for *Pro Hac Vice* Admission" in Case No. IPR2013-00639 (MPT) ["the Order"].

## **II. STATEMENT OF FACTS**

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Chiplunkar *pro hac vice*.

Mr. Chiplunkar is an experienced litigation attorney and has been involved in numerous complex litigations in federal courts. Mr. Chiplunkar's biography is attached hereto as Exhibit 2001 to this Motion.

Mr. Chiplunkar has reviewed U.S. Patent No. 8,611,404, and the papers already filed in this proceeding. Further, Mr. Chiplunkar is familiar with the pending litigation between the parties pending before the United States District Court, District of Delaware, entitled *TQ Delta LLC v. DISH Network Corporation, et al.*, Case No. 1-15-cv-00614; and, as such, is familiar with the subject matter at issue in this proceeding.

Petitioner does not oppose this motion for admission *pro hac vice* of Mr. Chiplunkar.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Chiplunkar as counsel *pro hac vice* during this proceeding.

### **III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR**

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Rajendra A. Chiplunkar attached hereto as Exhibit 2002 as required by the Order.

Respectfully submitted,

Dated: April 10, 2017

/Peter J. McAndrews/  
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*Lead Counsel for Patent Owner*

**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PATENT OWNER’S MOTION FOR PRO HAC VICE ADMISSION (Rajendra A. Chiplunkar)** and related documents, are being served via electronic mail on this 10<sup>th</sup> day of April, 2017, by electronic mail to the following:

Lead Counsel	Back-up Counsel
Heidi L. Keefe <a href="mailto:hkeefe@cooley.com">hkeefe@cooley.com</a> <a href="mailto:zpatdcdocketing@cooley.com">zpatdcdocketing@cooley.com</a> Cooley LLP Patent Group 1299 Pennsylvania Ave., NW, Ste 700 Washington, DC 20004	Stephen McBride <a href="mailto:smcbride@cooley.com">smcbride@cooley.com</a> Jennifer Volk <a href="mailto:jvolkfortier@cooley.com">jvolkfortier@cooley.com</a> Cooley LLP Patent Group 1299 Pennsylvania Ave., NW, Ste 700 Washington, DC 20004

Dated: April 10, 2017

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