

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Cedar Lane Technologies, Inc., Plaintiff, v. Sirius XM Radio, Inc., Defendant.	Case No. 3:20-cv-1103-SRC Patent Case Jury Trial Demanded
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MOTION FOR LEAVE TO PROCEED AS OUT-OF-TOWN COUNSEL

1. Plaintiff's counsel respectfully requests the Court, pursuant to Local Civil Rule 83.10(a), for leave to proceed as out-of-town counsel
2. Plaintiff's counsel was admitted to this district on March 12, 2020, and remains in good standing in all jurisdictions into which he is admitted.
3. Prior to becoming admitted to this district, Plaintiff's counsel, in coordination with local counsel, has gained substantial experience practicing in this District through acting as of counsel and/or pro hac vice counsel in the following case: *Encoditech LLC v. Valeo North America Inc.* (3:20-cv-00756, filed March 31, 2020).
4. As such, Plaintiff's counsel is well versed in the local rules and common practices of this Court.
5. Additionally, in light of the COVID-19 pandemic, the expense and logistics of separately hiring a local counsel, in addition to lead counsel who is already admitted into this District, would be uniquely burdensome to Plaintiff.
6. Counsel is fully prepared to engage this case as sole counsel for the Plaintiff in

this District.

WHEREFORE, Plaintiff's counsel respectfully requests leave to proceed as out-of-town counsel.

Dated: May 6, 2020

Respectfully submitted,

/s/ Isaac Rabicoff

Isaac Rabicoff

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Counsel for Plaintiff

Cedar Lane Technologies, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on May 6, 2020, via the Court's CM/ECF system.

/s/ Isaac Rabicoff
Isaac Rabicoff