

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SL CORPORATION,
Petitioner,

v.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC.
Patent Owner

INTER PARTES REVIEW OF U.S. PATENT NO. 7,241,034

Issue Date: July 10, 2007

Reexamination Certificate Issue Date: June 14, 2013

Title: Automatic Directional Control System for Vehicle Headlights

Inter Partes Review No. IPR2016-00193

MOTION OF SL CORPORATION
FOR PRO HAC VICE ADMISSION OF ADAM P. SAMANSKY

I. Statement of Precise Relief Requested

Petitioner SL Corporation (“SL”) respectfully requests that the Board admit Adam P. Samansky *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c).

II. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* during the Proceeding

Pursuant to 37 C.F.R. § 42.10(c), the Board may admit counsel *pro hac vice* for good cause, subject to any other conditions that the Board may require, so long as lead counsel is a registered practitioner. Good cause includes when “counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” 37 C.F.R. § 42.10(c).

This application satisfies the requirements of Section 42.10(c):

1. Lead counsel, Peter J. Cuomo, the undersigned, is a registered Practitioner. Currently listed back-up counsel, Kongsik Kim and Serge Subach, are also registered practitioners.

2. *Pro Hac Vice* Applicant, Mr. Adam P. Samansky, is an experienced litigator and has an established familiarity with the subject matter at issue in this proceeding, as shown in his accompanying Declaration dated June 20, 2016 (“Samansky Decl.”), Exhibit 1028. That declaration shows that Mr. Samansky possesses a legal and technical background related to the subject matter of this proceeding. Samansky Decl. ¶¶ 4-5. He is also directly familiar with U.S. Patent

No. 7,241,034 (“the ‘034 patent”), its prosecution history, and the prior art references that are the subject of this *inter partes* review proceeding. *Id.* ¶¶ 6-7.

3. Mr. Samansky is admitted, *pro hac vice*, and is lead trial counsel in the underlying litigation before the U.S. District Court for the District of Delaware, Case No. 1:15-cv-0565. Mr. Samansky was substantially involved with the preparation of the Petition filed in this proceeding. *Id.* ¶ 7. In particular, he worked on technical and strategic matters pertaining to the instant Petition and now-instituted IPR proceeding. *Id.* Mr. Samansky anticipates being significantly involved in the deposition and trial phase of this proceeding. *Id.*

4. Mr. Samansky is a member in good standing of the Bar of the Commonwealth of Massachusetts and the Bar of the State of New York. His Massachusetts Bar membership is 661123. And his New York Bar membership is 493582. *Id.* ¶ 2. He is admitted to practice before the Supreme Court of the United States, the United States Courts of Appeals for the Federal, First, Fourth, Sixth, and Ninth Circuits, and the United States District Court for the District of Massachusetts. *Id.*

5. In his declaration, Mr. Samansky also attests to each of the items referenced in the “Order – Authorizing Motion for *Pro Hac Vice* Admission – 37 C.F.R. § 42.10” in IPR2013-00639 (Paper No. 7).

For the foregoing reasons, Patent Owner SL Corporation respectfully requests that the Board admit Adam P. Samansky *pro hac vice* in this proceeding.

Respectfully submitted,

SL CORPORATION,

By its attorneys,

/Peter J. Cuomo /
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion of SL Corporation for Pro Hac Vice Admission of Adam P. Samansky was served on

June 24, 2016 by email to:

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By: /Peter J. Cuomo /
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