

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PRIME FOCUS CREATIVE SERVICES CANADA INC.

Petitioner

v.

LEGEND3D, INC.

Patent Owner

CASE IPR2016-01243

Patent No. 7,907,793

DECLARATION OF DANNA J. COTMAN IN SUPPORT OF
PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
DANNA J. COTMAN UNDER 37 CFR § 42.10 (LEGEND3D EX.1016)

I, Danna J. Cotman, declare:

I am competent to present this declaration given in support of the Motion for *Pro Hac Vice* Admission of Danna J. Cotman by Patent Owner Legend3D, Inc. (“Legend3D”), I have personal knowledge of the facts contained herein, and as to those facts I hereby attest to the following:

1. I am a member in good standing of the Bar of the State of California (State Bar Number 188245) admitted in June 1997.
2. I have not been suspended or disbarred from practice before any court or administrative body.
3. I have never had an application for admission to practice before any court or administrative body denied.
4. No sanctions or contempt citations have been imposed against me by any court or administrative body.
5. I have 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. I 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. I previously applied and was granted *pro hac vice* admission before the Office in Legend3D, Inc. v. Prime Focus VFX Services II Inc. *Inter Partes*

Review petition (IPR2015-01350) and in Legend3D, Inc. v. Prime Focus VFX Services II Inc. *Inter Partes Review* petition (IPR2016-00806) .

8. I am an experienced litigation attorney, with ten (10) years of experience litigating patent cases in federal courts. My experience includes representing clients in other intellectual property related litigation as well. I have appeared as counsel for Legend3D in a number of litigation matters (including patent litigation) over the span of my career. Further, I am currently lead counsel for the defense in the related patent infringement lawsuit entitled *Prime Focus Creative Services Canada, Inc. v. Legend3D, Inc.*, United States District Court, Central District of California, Case No. 2:15-cv-02340-MWF-PLA, and I therefore know the issues involved in that case which overlap with numerous issues involved in this proceeding.

9. Lead counsel Joseph J. Mayo with our office is a registered practitioner (Reg. No. 53288). I have worked with lead counsel in all aspects of preparing Legend3D's two previous *Inter Partes Reviews* petitions and Declarations in support thereof. From my experience, I am familiar with the established practices of the Board.

10. Lastly, counsel for the parties hereto have an agreement for non-opposition to any *pro hac vice* motion of counsel for the other party to this proceeding. (LEGEND3D Ex. 1017)

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on July 12, 2016



Danna J. Cotman

CERTIFICATE OF SERVICE

Pursuant to 37 Code of Federal Regulations § 42.6, the undersigned certifies that on July 12, 2016, a copy of the foregoing document was served via Express Mail on counsel of record identified below, and a courtesy copy was sent electronically, and that this document was filed with the Patent Trial and Appeal Board via the PTAB End-to-End System.

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