

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

KAWASAKI RAIL CAR, INC.
Petitioner,

v.

SCOTT BLAIR,
Patent Owner.

Case No. IPR2017-00117

Patent No. 6,700,602

Issue Date: March 2, 2004

Title: Subway TV Media System

**MOTION FOR *PRO HAC VICE* ADMISSION
OF MARK A. CHAPMAN**

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Kawasaki Rail Car, Inc. respectfully requests the *pro hac vice* admission of Mark A. Chapman as backup counsel for Petitioner in this proceeding. Patent Owner does not oppose this Motion. A declaration made by Mark A. Chapman in support of this motion is submitted herewith as Exhibit 1030.

I. STATEMENT OF FACTS

1. Mr. Chapman is a partner at the law firm of Andrews Kurth Kenyon LLP.
2. Mr. Chapman is a litigation attorney experienced in patent cases and is a member in good standing of the New York Bar. He has not had any application denied for admission to practice, nor has he been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.
3. Mr. Chapman has an established familiarity with the subject matter at issue in this proceeding.
4. In particular, Mr. Chapman has reviewed: the subject U.S. Pat. No. 6,700,602; the Petition (Paper No. 1), the prior art references at issue (Exs. 1005, 1009, 1011, 1021), and the declaration of Petitioner's expert (Ex. 1014); the Patent Owner's Preliminary Response (Paper No. 6), the Board's Institution Decision (Paper No. 11), the Patent Owner's Response (Paper

No. 13), and the declaration and supplemental declaration of Patent Owner's expert (Exs. 2002, 2004); the Petitioner's Reply (Paper No. 17) and the supplemental declaration of Petitioner's expert (Ex. 1025); the Patent Owner's Observations on the testimony of Petitioner's expert (Paper No. 22) and Petitioner's Motion to Exclude (Paper No. 23); the transcript of the deposition of Patent Owner's expert (Ex. 1026) and the transcript of the deposition of Petitioner's expert (Ex. 2006).

5. Mr. Chapman has also discussed the strategy, arguments and evidence in this proceeding with Ms. Mortazavi.

6. In addition, Mr. Chapman also will be seeking *pro hac vice* admission to appear in Petitioner's co-pending proceeding against Patent Owner, Inter Partes Review Case No. IPR 2016-00136, in which a trial has been instituted against additional claims of the same patent at issue in this proceeding. Mr. Chapman has discussed the strategy, arguments and evidence in that related proceeding with Ms. Mortazavi as well.

7. The Motion for *Pro Hac Vice* Admission of Mr. Chapman in Case No. IPR2017-00136 will be filed shortly. Patent Owner does not oppose that motion either.

8. In his declaration, Mr. Chapman also attests to each of the listed items required by the Order – Authorizing Motion for *Pro Hac Vice* Admission –

37 C.F.R. § 42.10 in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 at 2-4 (PTAB Oct. 15, 2013).

II. CONCLUSION

For the reasons stated above, Petitioner respectfully submits that there is good cause for the Board to recognize Mark A. Chapman *pro hac vice* during this proceeding.

Dated: January 3, 2018

Respectfully submitted,

/s/ Sheila Mortazavi

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 3, 2018, a complete and entire copy of this **MOTION FOR PRO HAC VICE ADMISSION OF MARK A. CHAPMAN** and **EXHIBIT 1030** were served via e-mail on the following:

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Respectfully submitted,

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