

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES, LLC,

Patent Owner

Case IPR2017-00347

Patent 8,805,001 B2

**DECLARATION OF MARK A. CHAPMAN IN SUPPORT OF
PATENT OWNER'S MOTION FOR PRO HAC VICE
ADMISSION UNDER 37 C.F.R. §42.10(c)**

Exhibit 2004

IPR2017-00347

Petitioner - Samsung Electronics Co., Ltd., et al.

Patent Owner - Image Processing Technologies LLC

I, Mark A. Chapman, declare as follows:


1. This declaration is given in support of Image Processing Technologies, LLC's Motion for *Pro Hac Vice* Admission of Mark A. Chapman under 37 C.F.R. § 42.10(c).
2. If admitted *pro hac vice* in this matter, I will serve as counsel with Chris Coulson, also of the law firm Andrews Kurth Kenyon LLP. Mr. Coulson is lead counsel and is a registered practitioner.
3. I am a partner at the law firm Andrews Kurth Kenyon LLP, where my practice focuses on patent-related matters, and in particular, patent litigation in a variety of technical fields.
4. I have over 15 years' experience in the field of patent law. My practice focuses on patent litigation in district courts around the country, appeals at the Federal Circuit, and Patent Office proceedings, such as reexaminations and inter partes review proceedings. For example, in the past several years, I have been involved in, *inter alia*, the following Patent Office inter partes reexaminations and inter partes review proceedings:
 - a. Inter Partes Review Case IPR2015-01838 (admitted pro hac vice)
 - b. Inter Partes Review Case IPR2016-00291 (admitted pro hac vice)
 - c. Inter Partes Review Case IPR2016-00292 (admitted pro hac vice)
 - d. Inter Partes Review Case IPR2016-00293 (admitted pro hac vice)

- e. Inter Partes Review Case IPR2016-01382 (admitted pro hac vice)
 - f. Reexamination Control No. 95/002,256, and related Appeal No. 2015-006,133 (P.T.A.B)
 - g. Reexamination Control No. 95/001,504.
 - h. Reexamination Control No. 95/001,630.
5. I am a member in good standing of the New York Bar. I have not had any application denied for admission to practice, nor have I been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.
 6. I am familiar with the subject matter of this proceeding. I have reviewed the subject U.S. Patent No. 8,805,001, as well as the petition for inter partes review filed by Petitioner in this proceeding. I am counsel for Patent Owner in the related, co-pending litigation.
 7. Given my familiarity with the subject matter of this proceeding and my experience, I have experience and expertise important to representing Patent Owner Image Processing Technologies, LLC in this matter.
 8. 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.
 9. I have read and will comply with and be subject to the United States

Patent and Trademark Office 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).

10. I declare that all statements made herein of my 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 are punishable by fine or imprisonment, or both, under § 1001 of Title 18 of the United States Code.

Executed on April 14, 2017



Mark A. Chapman