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

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



Pursuant to 37 C.F.R. § 42.10(c), Patent Owner respectfully requests the *pro hac vice* admission of Mark A. Chapman as backup counsel for Patent Owner in the current proceedings. A declaration made by Mark A. Chapman in support of this motion is submitted herewith as Exhibit 2004.

- 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, including U.S. Pat. No. 8,805,001 ("the '001 patent"), and the petition for *inter partes* review submitted by Petitioners as shown in his accompanying declaration.
- 4. 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 IPR2013-00639.



- 5. Motions for *Pro Hac Vice* Admission of Mr. Chapman are being concurrently filed in the following related *Inter Partes* Review proceedings:
 - i. IPR2017-00336
 - ii. IPR2017-00353
 - iii. IPR2017-00355
 - iv. IPR2017-00357

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

Date: April 14, 2017 /s/ Chris J. Coulson

Chris J. Coulson (Reg. No. 61,771) Andrews Kurth Kenyon LLP One Broadway

New York, New York 1004-1007

Tel: (212) 425-7200 Fax: (212) 425-5288

chriscouls on @andrewskurthken yon. com

Michael Zachary (pro hac vice)

Michael Zachary @Andrews Kurth Kenyon.com

Mark Chapman (pro hac vice)

MarkChapman@AndrewsKurthKenyon.com

Rose Cordero Prey (pro hac vice)

RosePrey@AndrewsKurthKenyon.com



CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on April 14, 2017, the foregoing *Patent Owner's Motion for Pro Hac Vice Admission of Mark*A. Chapman is being served via electronic mail upon the following counsel of record for Petitioner:

John Kappos (Reg. No. 37,861) jkappos@omm.com
Nick Whilt (Reg. No. 72,081) nwhilt@omm.com
Brian M. Cook (Reg. No. 59,356) bcook@omm.com
IPTSAMSUNGOMM@omm.com

/s/ Chris J. Coulson
Chris J. Coulson
Registration No. 61,771
ANDREWS KURTH KENYON LLP
One Broadway
New York, NY 10004
(212) 425-7200

Attorney for Patent Owner Image Processing Technologies, LLC

