

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 IPR2017-00353
Patent 8,983,134 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.

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, including U.S. Pat. No. 8,983,134 (“the ’134 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. IPR2017-00347
- ii. IPR2017-00336
- 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
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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:

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