

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

**PATENT OWNER'S MOTION FOR *PRO HAC VICE*
ADMISSION OF ROSE CORDERO PREY 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 Rose Cordero Prey as backup counsel for Patent Owner in the current proceedings. A declaration made by Ms. Prey in support of this motion is submitted herewith as Exhibit 2005.

1. Statement of Facts

1. Ms. Prey is a partner at the law firm of Andrews Kurth Kenyon LLP.
2. Ms. Prey is an experienced litigation attorney. Ms. Prey has been litigating patent cases for over 10 years, and has experience litigating patent infringement cases in many district courts and before the U.S. International Trade Commission. Among her experience in patent litigation matters, Ms. Prey has been counsel at trial, hearings, and with respect to patent-related summary judgment proceedings and other patent-related hearings and pleadings concerning, *inter alia*, patent validity, claim construction, and infringement issues.
3. Ms. Prey received a Bachelor's of Science degree in Mathematics, with a minor in Physics, in 2001.
4. Ms. Prey has an established familiarity with the subject matter at issue in this proceeding. Ms. Prey is trial counsel for Patent Owner and has been actively involved in all aspects of the Eastern District of Texas court proceeding against Petitioner involving the same patents and

technology (*Image Processing Technologies, LLC v. Samsung Electronics Co., Ltd., et al.*, 2:16-cv-00505-JRG).

5. Ms. Prey is a member in good standing of the State Bar of New York as well as the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of Texas, and the United States Court of Appeals for the Federal Circuit.
6. Ms. Prey has never been suspended or disbarred from practice before any court or administrative body.
7. No application of Ms. Prey for admission to practice before any court or administrative body has ever been denied.
8. No sanctions or contempt citations have been imposed against Ms. Prey by any court or administrative body.
9. Ms. Prey has 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 Title 37 of the Code of Federal Regulations..
10. Ms. Prey understands that she 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).

11. Ms. Prey has applied to appear *pro hac vice* in three proceedings before the United States Patent and Trademark Office in the last three (3) years, *Micron Technology, Inc. and Micron Memory Japan, Inc. v. Massachusetts Institute of Technology*, IPR2015-01087; *Apple Inc., v. Limestone Memory Systems LLC*, IPR2016-01561; and *Apple Inc. v. Limestone Memory Systems LLC*, IPR2016-01567.

12. Motions for *Pro Hac Vice* Admission of Ms. Prey are being concurrently filed in the following related *Inter Partes* Review proceedings:

i. IPR2017-00347

ii. IPR2017-00336

iii. IPR2017-00355

iv. IPR2017-00357

2. Conclusions

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

Date: April 14, 2017

/s/ Chris J. Coulson

Chris J. Coulson (Reg. No. 61,771)

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