

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LKQ Corporation and Keystone Automotive Industries, Inc.,

Petitioners,

v.

GM Global Technology Operations LLC,

Patent Owner.

Case No.: IPR2020-00534

U.S. Design Patent No. D797,625 S

**PETITIONER'S UNOPPOSED MOTION
FOR ADMISSION *PRO HAC VICE*
OF IFTEKHAR A. ZAIM UNDER 37 C.F.R. § 42.10**

TABLE OF PETITIONER'S EXHIBITS

| Exhibit No. | Description |
|--------------------|---|
| 1001 | U.S. Patent No. D797,625 (“the ’625 Patent”). |
| 1002 | File History for U.S. Patent No. D797,625. |
| 1004 | Declaration of James M. Gandy, dated February 7, 2020. |
| 1004 | Declaration of Jason C. Hill, dated February 7, 2020. |
| 1005 | 2018 Chevrolet Equinox Brochure, http://www.auto-brochures.com/makes/Chevrolet/Equinox/Chevrolet_US%20Equinox_2018.pdf . |
| 1006 | U.S. Design Patent No. D773,340 “Lian.” |
| 1007 | 2010 Hyundai Tucson Brochure, http://www.auto-brochures.com/makes/Hyundai/Tucson/Hyundai_US%20Tucson_2010.pdf , archived on April 2, 2014 by Internet Archive organization’s “Wayback Machine” at https://web.archive.org/web/20140402003154/http://www.auto-brochures.com/makes/Hyundai/Tucson/Hyundai_US%20Tucson_2010.pdf . |
| 1008 | Exemplary images of the 2010 Hyundai Tucson Brochure, http://www.auto-brochures.com/makes/Hyundai/Tucson/Hyundai_US%20Tucson_2010.pdf , archived on April 2, 2014 by Internet Archive organization’s “Wayback Machine” at https://web.archive.org/web/20140402003154/http://www.auto-brochures.com/makes/Hyundai/Tucson/Hyundai_US%20Tucson_2010.pdf . |
| 1009 | File History of U.S. Patent No. D773,340 “Lian” |
| 1010 | File History of U.S. Pat. App. Ser. No. 29/516,319 (“the ’319 Application”) |

| Exhibit No. | Description |
|--------------------|---|
| 1011 | Source code of Auto-brochures.com, http://www.auto-brochures.com/ , archived on March 13, 2014 by Internet Archive organization's "Wayback Machine" at https://web.archive.org/web/20140313222453/http://www.auto-brochures.com/ . |
| 1012 | Source code of Auto-brochures.com, http://www.auto-brochures.com/ , archived on May 17, 2014 by Internet Archive organization's "Wayback Machine" at https://web.archive.org/web/20140517005107/http://www.auto-brochures.com/ . |
| 1013 | Declaration of Margaret Herrmann, dated February 6, 2020. |
| 1014 | Curriculum Vitae of James M. Gandy. |
| 1015 | Curriculum Vitae of Jason C. Hill |
| 1016 | Declaration of Iftekhar A. Zaim in support of Petitioner's Unopposed Motion for Admission <i>Pro Hac Vice</i> under 37 C.F.R. § 42.10 |

Petitioner LKQ Corporation and Keystone Automotive Industries, Inc. (“Petitioner”) respectfully requests that the Board admit Iftekhar A. Zaim *pro hac vice* in this proceeding. Counsel for Patent Owner GM Global Technology Operations, LLC confirmed that it does not oppose this motion. This motion is authorized pursuant to the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response entered in this proceeding. IPR2020-00534, Paper 3, at 2 (PTAB Feb. 13, 2019).

I. LEGAL STANDARD

“The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” 37 C.F.R. §42.10(c); *see also Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639 (PTAB Oct. 15, 2013) (Paper 7) (requirements for admission *pro hac vice*). The facts set forth below and in the accompanying Declaration of Iftekhar A. Zaim in Support of Petitioner’s Motion for Admission *Pro Hac Vice* (Ex. 1016, “Zaim Dec.”) establish good cause to recognize Mr. Zaim *pro hac vice* in this proceeding.

II. STATEMENT OF FACTS

Petitioner's Lead Counsel in this proceeding, Barry F. Irwin, is a registered practitioner.

Counsel Iftekhar A. Zaim is an experienced litigation attorney with nearly five years' experience in private law practice as an intellectual property litigator, including substantial experience with patent litigation. Zaim Dec. at ¶ 9. Mr. Zaim has been substantially involved in more than eight patent cases and proceedings, including cases before various district courts and the United States International Trade Commission, as well as in a number of other non-patent cases before United States District Courts and the United States Court of International Trade. *Id.* Mr. Zaim has experience with dispositive motion practice as well as fact and expert discovery. *Id.* Mr. Zaim has also served as counsel *pro hac vice* in a previous *inter partes* review proceeding before the Board, IPR2018-00802, and served as first chair at oral argument in that proceeding. *Id.*

Mr. Zaim is a member in good standing of the Illinois State Bar. *Id.* at ¶ 2. He has no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations. *Id.* at ¶¶ 3–5.

Mr. Zaim is familiar with the subject matter and patent at issue in this proceeding, U.S. Design Patent No. D797,625 S (“the ’625 Patent”), including its prosecution history and the technical field to which the ’625 Patent is addressed. *Id.*

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