

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 MICHAEL N. ZACHARY 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 Michael N. Zachary as backup counsel for Patent Owner in the current proceedings. A declaration made by Mr. Zachary in support of this motion is submitted herewith as Exhibit 2003.

1. Statement of Facts

1. Mr. Zachary is a litigation attorney experienced in patent cases, and is admitted to practice law in California, Oregon, and Washington State, as well as the following Federal Courts:

U.S. District Court for the Central District of California;

U.S. District Court for the Eastern District of California;

U.S. District Court for the Northern District of California;

U.S. District Court for the Southern District of California;

U.S. District Court for the District of Colorado;

U.S. District Court for the District of Oregon;

U.S. District Court for the Eastern District of Texas;

U.S. District Court for the Eastern District of Washington;

U.S. District Court for the Western District of Washington.

2. Mr. Zachary 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. Zachary has an established familiarity with the subject matter at issue in this proceeding, having represented Patent Owner in an Eastern District of Texas court proceeding against Petitioner involving the same technology (*Image Processing Technologies, LLC v. Samsung Electronics Co., Ltd., et al.*, 2:16-cv-00505-JRG).
4. Mr. Zachary 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 the C.F.R.
5. Motions for *Pro Hac Vice* Admission of Mr. Zachary are being concurrently filed in the following additional *Inter Partes* Review proceedings involving the same parties:
 - a. IPR2017-00336
 - b. IPR2017-00353
 - c. IPR2017-00355
 - d. IPR2017-00357

2. Conclusions

For the reasons stated above, Patent Owner respectfully submits that there is good cause for the Board to recognize Michael N. Zachary *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

chrisoulson@andrewskurthkenyon.com

Michael Zachary (*pro hac vice*)

MichaelZachary@AndrewsKurthKenyon.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 Michael N. Zachary* 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