UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PELOTON INTERACTIVE, INC.,

Petitioner

v.

JOHNSON HEALTH TECH CO., LTD.,

Patent Owner.

PTAB Case No. IPR2023-01165

Patent No. 11,227,340

PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF CHRISTOPHER G. HANEWICZ PURSUANT TO 37 C.F.R. § 42.10(C)

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 11,227,340 ("'340 patent")
1002	Declaration of Lee Rawls ("Rawls")
1003	File History of U.S. Patent No. 11,227,340
1004	U.S. Patent No. 9,785,827 ("Ray")
1005	Reserved
1006	U.S. Patent App. Pub. No. 2010/0160115A1 ("Morris")
1007	Reserved
1008	U.S. Patent No. 6,638,198 ("'198 patent")
1009	File History of U.S. Patent No. 10,796,375
1010	Reserved
1011	Reserved
1012	U.S. Patent App. Pub. No. 2009/0176629 ("Yi")
1013	U.S. Patent No. 6,575,878 ("Choy")
1014	U.S. Patent No. 8,690,735 ("Watterson")
1015	Affidavit of Ashelee E. Sherman in Support of Petitoner's Motion for Pro Hac Vice Admission
1016	Affidavit of Christopher G. Hanewicz in Support of Petitoner's Motion for Pro Hac Vice Admission

Petitioner Peloton Interactive, Inc. ("Petitioner") respectfully request that the Board admit Christopher G. Hanewicz as backup counsel *pro hac vice* in this proceeding. Mr. Hanewicz is a litigation attorney and has substantial knowledge of the substantive issues concerning invalidity of the challenged claims of the Patent in this proceeding. He is counsel for Petitioner in the related district court proceeding. Therefore, Mr. Hanewicz meets the requirements of "an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding" under 37 C.F.R. §42.10(c).

I. TIME FOR FILING

This Motion for *Pro Hac Vice* Admission has been authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, dated August 28, 2023 (Paper No. 6). This Motion is filed no sooner than twenty-one (21) days after service of the petition.

II. STATEMENT OF FACTS

In this proceeding, lead counsel for Petitioner is Babak Tehranchi, a registered practitioner. The following statement of facts shows that there is good cause for the Board to admit Mr. Hanewicz pro hac vice.

Mr. Hanewicz is a patent litigation attorney with almost twenty-five years of experience representing clients in cases involving patents or other intellectual property interests. (Affidavit of Christopher G. Hanewicz ("Hanewicz Affidavit"),

¶ 7 in Exhibit 1016.) He is a member in good standing of the State Bar of Wisconsin and the Western District of Wisconsin. Mr. Hanewicz has also been admitted pro hac vice to the District of Delaware, Northern District of Illinois, Eastern District of Michigan, and the Southern District of New York.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for pro hac vice admission is accompanied by an Affidavit of Mr. Hanewicz (Exhibit 1016), as required.

IV. CONCLUSION

Accordingly, Petitioner submits that there is good cause under 37 C.F.R. 42.10(c) for the Board to admit Christopher G. Hanewicz as counsel pro hac vice and to authorize Mr. Hanewicz to represent Petitioner as backup counsel in this proceeding.

Dated: January 30, 2024

Respectfully submitted,

/Babak Tehranchi/

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Back-up Counsel
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of this **PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF CHRISTOPHER G. HANEWICZ** were served in their entirety this 29th day of January 2024 by electronic mail on the Patent Owner via its attorneys of record

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Dated: January 30, 2024

Respectfully submitted,

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