UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

GEOSCOPE TECHNOLOGIES PTE. LTD.
Patent Owner

Case No. IPR2023-01210
U.S. Patent No. 8,400,358

PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER M. GERSON UNDER 37 C.F.R. § 42.10(c)

Pursuant to § 37 C.F.R. § 42.10(c), Patent Owner Geoscope Technologies Pte. Ltd. ("Patent Owner") respectfully requests *pro hac vice* admission of Christopher M. Gerson in this proceeding, IPR2023-01210, regarding U.S. Patent No. 8,400,358 ("the '358 patent").

I. THE REQUEST IS TIMELY

Pursuant to the Board's "NOTICE OF FILING DATE ACCORDED TO PETITION AND TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE," dated August 24, 2023 (Paper No. 3), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), Patent Owner respectfully requests that the Board allow Christopher M. Gerson to appear *pro hac vice* on its behalf in this proceeding. Petitioner consents to this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37 C.F.R. § 42.10(c), Petitioner has demonstrated good cause to admit Mr. Gerson *pro hac vice* in this proceeding. In particular, Patent Owner's lead counsel is a registered practitioner, and Mr. Gerson is an experienced litigation attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty one days after service of the petition; includes a statement of facts showing good cause for the Board to recognize Mr. Gerson *pro hac vice*; and is being filed concurrently with

Exhibit 1, the Declaration of Christopher M. Gerson in Support of Patent Owner's Motion for *Pro Hac Vice* Admission of Christopher M. Gerson ("Gerson Decl."), all in accordance with the "Order Authorizing Motion for *Pro Hac Vice Admission*" in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c) provides that "[t]he 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."

2. Ryan J. Singer, lead counsel for Patent Owner in this proceeding, is a registered practitioner holding Registration No. 79,736.

3. As set forth in the Gerson Declaration, Mr. Gerson is an experienced litigating attorney. Specifically, Mr. Gerson has sixteen years of experience representing clients in patent litigations in United States district courts and at the International Trade Commission. (Gerson Decl., ¶ 2).

4. Mr. Gerson also has an established familiarity with the precise subject matter at issue in this proceeding. Patent Owner has asserted against Petitioner U.S. Patent No. 8,400,358 ("the '358 patent"), the patent at issue in this proceeding. In the course of this representation, he has developed a strong familiarity with the '358 patent and the issues that may arise in this IPR. (Gerson Decl., ¶ 5).

5. Mr. Gerson has attested to the each of the requirements set forth in paragraph 2(b)(i)-(viii) of the "Order Authorizing Motion for Pro Hac Vice Admission" in Case IPR2013-00639, Paper 7. (Gerson Decl., ¶¶ 3-10).

6. The Commissioner is hereby authorized to charge all fees due in connection with this *pro hac vice* application to Attorney Deposit Account 195469.

IV. CONCLUSION

In view of the foregoing, Patent Owner respectfully submits that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and request an Order permitting Christopher M. Gerson to appear *pro hac vice* on its behalf in this proceeding.

Dated: October 3, 2023

/Ryan J. Singer/

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.8(b)(4), the undersigned hereby certifies that PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER M. GERSON UNDER 37 C.F.R. § 42.10(c) and EXHIBIT 1 - DECLARATION OF CHRISTOPHER M. GERSON IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER M. GERSON UNDER 37 C.F.R. § 42.10(c) were served electronically *via* e-mail on October 3, 2023 on the following counsel of record:

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