

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HESAI TECHNOLOGY CO. LTD.,
Petitioner

v.

OUSTER, INC.
Patent Owner

Case IPR2023-01421
U.S. Patent No. 11,175,405

**PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION
OF RON HAGIZ UNDER 37 C.F.R. § 42.10(c)**

Petitioner Hesai Technology Co. Ltd. respectfully requests that the Board recognize Ron Hagiz as counsel *pro hac vice* during the above-captioned proceeding.

A. Background

This Motion for Admission is being filed in compliance with and pursuant to the “Order-Authorizing Motion for Pro Hac Vice Admission” in *Unified Patents v. Parallel Iron*, Case No. IPR2013-00639, Paper 7 (Oct. 15, 2013) (the “Order”) and the Board’s authorization provided in the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response issued in the above captioned proceedings.

B. Statement of Facts Showing Good Cause

Petitioner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. § 42.10(c) pursuant to the Notice of Filing Date Accorded to Petition in the above captioned proceeding. Petitioner’s lead counsel is a registered practitioner, Jared W. Newton, Reg. No. 65,818.

As demonstrated below and in the accompanying declarations, there is good cause for the Board to recognize Mr. Hagiz *pro hac vice*.

Mr. Hagiz has been practicing law for at least 14 years, with significant experience being in patent litigation. Mr. Hagiz is duly authorized to practice law in the State of New York and is a member in good standing of the New York bar.

(Ex. 1031 ¶ 1.) Furthermore, Mr. Hagiz has established familiarity with the subject matter at issue in this proceeding, including the patent-at-issue in the above-captioned proceeding, the corresponding petition and prior art asserted, Patent Owner's Preliminary Response, the Board's Institution Decision, as well as all exhibits and all other documents filed. (Ex. 1031 ¶ 9.) Mr. Hagiz was also centrally involved in the related ITC Investigation, *Certain LiDAR (Light Detection and Ranging) Systems and Components Thereof*, Inv. No., 337-TA-1363 (USITC), which involved the patent at issue before that proceeding was terminated. (Ex. 1031 ¶ 9.)

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Ron Hagiz as counsel *pro hac vice* during this proceeding.

C. Declaration of Individuals Seeking to Appear

This Motion for Admission *Pro Hac Vice* is accompanied by the Declaration of Ron Hagiz attached hereto as Exhibit 1031, as required by the Order.

Date: June 3, 2024

/s/ Jared W. Newton
Jared W. Newton
(Reg. No. 65,818)

CERTIFICATE OF SERVICE

I certify that on June 3, 2024, I am causing a copy of the foregoing document to be served upon the following lead and backup counsel for Patent Owner via electronic mail:

Phillip Morton (Lead Counsel)	<u>pmorton@cooley.com</u>
Eamonn Gardner (Back-up Counsel)	<u>egardner@cooley.com</u>

Respectfully submitted,

By: /s/Jared W. Newton

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