UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HANSHOW AMERICA INC. and HANSHOW TECHNOLOGY CO., LTD.,
Petitioners

v.

SES-IMAGOTAG GMBH,
Patent Owner

Case: IPR2024-00189

Patent 10,674,340

PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER J. FAHY PURSUANT TO 37 C.F.R. § 42.10(c)

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

PETITIONERS' UPDATED EXHIBIT LIST

Exhibit Number	Description
1001	U.S. Patent No. 10,674,340
1002	Prosecution history of U.S. Patent No. 10,674,340
1003	Certified translation of Japan Patent Application Publication No. 2008-77131A by Fujiwara ("Fujiwara")
1004	Japan Patent Application Publication No. 2008-77131A by Fujiwara
1005	International Patent Application Publication No. WO 2010/082835A1 by Arntzen ("Arntzen")
1006	U.S. Patent Application Publication No. 2007/024436A1 by Bandy ("Bandy")
1007	U.S. Patent Application Publication No. 2008/0231228A1 by Fowler ("Fowler")
1008	Curriculum Vitae of Dr. Manos M. Tentzeris
1009	Declaration of Dr. Manos M. Tentzeris
1010	Declaration of Christopher J. Fahy in Support of Motion for *Pro Hac Vice* Admission

Pursuant to 37 C.F.R. § 42.10(c) and in response to the authorization provided in the Notice of Filing Date Accorded to Petition (Paper 4), Petitioners hereby move for the admission of Christopher J. Fahy to appear *pro hac vice* on its behalf, as back-up counsel, before the Board in IPR2024-00189. This motion follows the guidelines set forth in IPR2013-00639, Paper 7, entered October 15, 2013.

I. TIME FOR FILING

This motion for *pro hac vice* admission is filed no sooner than 21 days after service of the petition.

II. STATEMENT OF FACTS

There is good cause for the Board to recognize Mr. Fahy *pro hac vice.* Lead counsel for this proceeding, Hao Tan, is a registered practitioner (Registration No. 73,711).

Mr. Fahy is an experienced litigation attorney. He has been involved in numerous patent infringement cases in federal district courts across the country. He has significant experience in all aspects of patent litigation matters, including depositions, claim construction hearings, summary judgment hearings, trial, and appeal.

Mr. Fahy is a member in good standing of the Bar of the State of Illinois, as well as the State of Wisconsin. He is also admitted to practice before the U.S. District

Courts for the Northern District of Illinois, Eastern and Western Districts of Wisconsin, Eastern District of Michigan, Eastern District of Texas, Northern District of Florida, and the U.S. Court of Appeals for the Federal and Seventh Circuits.

Mr. Fahy has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him.

Mr. Fahy has reviewed and is familiar with the patent at issue here, U.S. Patent No. 10,674,340 (the "'340 Patent") and its prosecution history. Mr. Fahy has also reviewed and is familiar with the Petition in this proceeding, as well as the other filings and exhibits, and the rulings and decisions by the Board in this matter, including the prior art relied upon and the various legal and factual arguments made by the parties. As such, Mr. Fahy has established familiarity with the subject matter at issue in this proceeding. *See*, *e.g.*, Ex. 1010 (Declaration of Christopher J. Fahy).

Mr. Fahy 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 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et. seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

Accordingly, Petitioners respectfully submit that there is good cause for the Board to recognize Mr. Fahy as counsel *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for *pro hac vice* admission is accompanied by a Declaration of Mr. Fahy (Ex. 1010).

Dated: August 5, 2024

Respectfully submitted,

/Hao Tan/

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Counsel for Petitioners.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August, 2024, a copy of the attached PETITIONERS' MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER J. FAHY, was served by electronic mail to the attorneys of record for Patent Owner at the following addresses:

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By: /Hao Tan/
Hao Tan (Reg. No. 73,711)