

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SES-IMAGOTAG GMBH,
Patent Owner.

Case No. IPR2024-00208

Patent No. 11,010,709

**PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF
GRANT E. KINSEL PURSUANT TO 37 C.F.R. § 42.10(C)**

EXHIBIT LIST

Exhibit	Description
2001	French patent office (Institut National De La Propriété Industrielle, or “INPI”) Preliminary Search Report, February 12, 2016
2002	French patent office (Institut National De La Propriété Industrielle, or “INPI”), “Opinion écrite” (Office Action), February 17, 2016
2003	Machine English Translation of Exhibit 2002
2004	French Patent No. 3039681 to Bottine
2005	U.S. Patent Application Publication No. 2015/0178767A1 to Wu et al.
2006	Comparison Document of Wu (Ex. 1003), Figs. 1–5E, 1:1–9:31, <i>with</i> Wu Pub. (Ex. 2005), Figs. 1–5E, ¶¶[0001]–[0076].
2007	Translation of French patent office (Institut National De La Propriété Industrielle, or “INPI”) Preliminary Search Report, February 12, 2016, with certification
2008	Translation French patent office (Institut National De La Propriété Industrielle, or “INPI”), “Opinion écrite” (Office Action), February 17, 2016, with certification
2009	Translation of French Patent No. 3039681 to Bottine, with certification
2010	Declaration of Dr. Rajeev Surati, Ph.D.
2011	CV of Dr. Rajeev Surati, Ph.D.
2012	U.S. Application No. 2011/0102144 (“Okina”)
2013	U.S. Application No. 2008/0198001 (“Sarma”)
2014	Jo Henssen, <i>Basic Principles of the Main Cadastral System in the World</i> , Modern Cadastres and Cadastral Innovations (May 16, 1995)
2015	Cadastre - Site officiel de la Ville d'Esblly, https://www.esbly.fr/mon-quotidien/urbanisme-travaux-cadre-de-vie/cadastre/
2016	Excerpt of Meriam-Webster’s Collegiate Dictionary, 11th ed. (2014)
2017	U.S. Patent No. 8,923,893

Exhibit	Description
2018	U.S. Patent No. 7,957,998
2019	Edwin Bergsma, <i>Planogram Data Requirements</i> , Global Retail Business Solutions (2011)
2020	U.S. Patent No. 7,949,568
2021	Epac, <i>Planograms 101: What They Are and Why They're Important for Your Brand</i> , https://epacflexibles.com/en-gh/planograms-101-what-they-are-and-why-theyre-important-for-your-brand/ (last accessed Aug. 26, 2024)
2022	Erwin Bergsma, <i>Analyzing your first planogram</i> , Global Retail Business Solutions (Aug. 2015)
2023	U.S. Patent Application Publication No. 2021/0182774
2024	Masao Ohta & Yoshiyuki Higuchi, <i>Study on the Design of Supermarket Store Layouts: The Principle of "Sales Magnet,"</i> 7 Int'l J. of Econ. Mgmt. Eng. 209 (2013)
2025	A. Deepak Gupta, <i>Media Access Control (MAC): MAC Spoofing and its Countermeasures</i> , 2 Int'l J. Recent Trends in Eng., 17 (Nov. 2009)
2026	Deposition Transcript of Emmanouil (Mano) M. Tentzeris, PhD (Aug. 23, 2024)
2027	Declaration of Grant Kinsel

Patent Owner SES-ImagoTag GmbH (“Patent Owner”) respectfully request that the Board admit Grant E. Kinsel as backup counsel *pro hac vice* in this proceeding. Mr. Kinsel is a patent litigation attorney with substantial knowledge of the substantive issues concerning invalidity of the challenged claims of the Patent in this proceeding. He is counsel for Patent Owner in the related district court proceeding. Therefore, Mr. Kinsel 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 is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on November 28, 2023 (Paper No. 3). 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 Patent Owner is Jessica Kaiser, a registered practitioner. The following statement of facts demonstrate good cause for the Board to recognize Mr. Kinsel *pro hac vice*.

Mr. Kinsel is a patent litigation attorney with thirty years of experience representing clients in cases involving patents or other intellectual property interests. (Affidavit of Grant Kinsel (“Kinsel Affidavit”), ¶ 7 in Exhibit 2027.) He is a member

in good standing of the State Bars of California and Washington. Mr. Kinsel has also been admitted *pro hac vice* before the Board in IPR2023-00643.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This motion for pro hac vice admission is accompanied by the Affidavit of Mr. Kinsel (Exhibit 2027), as required.

IV. CONCLUSION

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

Respectfully submitted,

Dated: October 25, 2024

By: / Jessica Kaiser /
Jessica C. Kaiser
Reg. No. 58,937
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on October 25, 2024, a copy of
**PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF
GRANT E. KINSEL PURSUANT TO 37 C.F.R. § 42.10(C) and EXHIBIT 2027**
was served upon the below-listed counsel by electronic mail:

Hao Tan
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Shen Wang
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Dated: October 25, 2024

By: / Jessica Kaiser /
Jessica C. Kaiser
Reg. No. 58,937
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