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

AFFIDAVIT OF GRANT E. KINSEL IN SUPPORT OF PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION

I, Grant E. Kinsel, being duly sown and upon oath, hereby apply to appear *pro hac vice* before the Office in *inter partes vice* before the Office in *inter partes* review proceedings under PTAB Case No. IPR2024-00208 on U.S. Patent 11,010,709 and here by attest to the following:

1. I am a member in good standing of the State Bars of California and Washington. I have also been admitted *pro hac vice* to the United States District Courts of Delaware, Southern District of Mississippi, Eastern and Southern Districts of New York, and many others.

2. I have not been suspended or disbarred from practice before any court or administrative body.

3. I have never had an application for admission to practice before any court or administrative body denied.

4. No sanction or contempt citation has been imposed against me by any court or administrative body.

5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Title 37, Part 42 of the C.F.R., and the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 10.20 et seq.

6. I will be subject to the USPTO Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 et seq. and the USPTO's disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I am an experienced patent litigation attorney with more than thirty years of experience representing clients in cases involving patents and other intellectual property interests. I litigate patent cases in various forums, including federal district courts across the United States. Through my experience in patent litigation matters, I have represented clients in many phases of litigation including jury trials, *Markman* hearings, discovery, and appeals. My biography is attached hereto as Appendix A.

8. I have familiarity with the subject matter at issue in this proceeding and represent Patent Owner as counsel in a parallel court proceeding against Petitioner involving the same technology (*SES-IMAGOTAG SA, SES-IMAGOTAG GMBH, AND SESIMAGOTAG INC. v. HANSHOW AMERICA INC. AND HANSHOW TECHNOLOGY CO., LTD.*, Case No. :23-cv-01667 (E.D.N.Y)). In this case, I handle all phases of the litigation from discovery through trial and will continue to be involved in the case as counsel.

9. I am familiar with the technologies and issued claims in the 11,405,669, 10,674,340, and 11,010,709 Patents. I am familiar with the prior art references cited

in PTAB Case Nos. IPR2024-00188, IPR2024-00189, and IPR2020-00208 and the associated invalidity grounds before the PTAB.

10. In the previous three years, I have applied to appear *pro hac vice* before the Office in IPR2023-00643.

I hereby declare that all statements made on my own knowledge are true and that all statements made on information and belief are believed to be true. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of the Title 18 of the United States Code.

Respectfully submitted,

Dated: October 25, 2024

By: */ Grant Kinsel /*
Grant Kinsel

Attorney for Patent Owner

APPENDIX A

Perkins Coie

Grant E. Kinsel

PARTNER
Patent Litigation

Seattle, WA

GKinsel@perkinscoie.com
206.359.3516 | Website Bio

Grant protects the integrity and worth of patents held by some of the world's largest technology companies and defends those companies from patent infringement claims.

Grant Kinsel's litigation strategies are distinctive for their effectiveness, efficiency, and novelty, frequently resulting in early, pre-trial resolution and added value for his clients. Getting the right result in patent litigation requires a commitment to creativity, and Grant's bottom-up approach ensures that the optimum strategy is deployed for each case. He designs a strategy—from initial discovery, to motion practice, and ultimately through trial and appeal—to achieve the optimum result tuned to the particular case, client, and facts.

Grant has extensive courtroom experience, prevailing for clients in the most patent-heavy dockets in courts throughout the country, including the U.S. District Courts for the Eastern District of Texas, the Northern District of California, the District of Delaware, and the Central District of California. He has litigated patents in a range of technologies and industries, including the Internet of Things, radio-frequency identification, tracking and mapping systems, cloud and internet services, content provision, encryption, and digital rights management.

He has litigated patents from advanced tech—speech recognition and optical character recognition (OCR), semiconductors, LEDs and MEMS, optics, and high-end digital signal processing techniques—to low tech—toys, lighting systems, and sporting goods, with each case and step along the way specifically considered and tailored to achieving the right result for the particular case.

Grant also has federal court litigation experience, including matters relating to design patents, copyrights, trademarks, trade secrets, and unfair competition. He has also represented clients at the intersection of criminal law and intellectual property law, including investigations and litigation arising out of alleged criminal trademark infringement and theft of trade secrets.

Experience

Patent Litigation: IoT, RFID, Tracking and Mapping Methods, Devices and Systems

Axcess International, Inc. v. TransCore LP

RFID-based remote monitoring systems.

Microsoft Corporation v. Geotag, Inc.

Mapping products and services.

Microsoft Corporation v. LBS Innovations LLC, et al.

Web-based mapping products and services.

LBS Innovations LLC v. Microsoft Mobile

Mobile mapping products.

*Single Chips Systems v. TransCore Inc.**

Radio Frequency Identification systems.

*TransCore Inc. v. Electronic Transaction Corporation**

Radio Frequency Identification systems.

*Williams Wireless Technology Inc. v. Rockwell Collins Inc., et al.**

UHF and VHF flight data transmission systems.

* Prior firm experience

Patent Litigation: Cloud and Internet Services, Content Provision, Encryption and Digital Rights Management

Zitovault, LLC v. Amazon.com, Inc., et al.

Cloud encryption and security.

Eolas Technologies Incorporated v. Amazon.com, Inc.

Internet content provision.

Multiplayer Network Innovations, LLC v. Nintendo of America, et al.

Multiplayer network protocols.

Digital Media Technologies, Inc. v. Netflix, Inc., et al.

Digital rights management.

Guardian Media Technologies, Ltd. v. Acer America Corporation

Parental control systems.

Guardian Media Technologies, Ltd. v. Coby Electronics Corporation

Parental control systems.

*American Video Graphics L.P. v. Electronic Arts Inc.**

3-D modeling technologies.

* Prior firm experience

Patent Litigation: Speech Recognition and Optical Character Recognition

Microsoft Corporation v. Phoenix Solutions

Speech recognition and natural language processing.

Potter Voice Technologies, LLC v. Google, Inc., et al.

Associative searching for speech recognition.

*Nuance Communications v. ABBYY USA Software House**

Optical character recognition technology.

* Prior firm experience

Patent Litigation: Semiconductors, LEDs and MEMS

Triton Tech of Texas, LLC v. Nintendo of America Inc.

Mems-gyroscopes and accelerometer technologies.

Thorner v. Microsoft Corporation

Haptic feedback devices and methods.

Shared Memory Systems, LLC v. Apple

Graphics processing systems and methods.

Harvatek Corporation v. Cree, Inc.

LED design.

*e.Digital Corporation v. Sanyo North America**

Flash ROM memory systems.

*In re Ronald A. Katz Technology Licensing LP**

Interactive call processing technology.

* Prior firm experience

Patent Litigation: Optics and Audio Systems

ThinkOptics, Inc. v. Nintendo of America Inc., et al.

Optics-based direct-pointing devices and methods.

*Scalar v. Celestron**

Night vision systems.

Crest Audio, Inc. v. QSC, LLC

Use of DSPs in audio amplifiers.

Shure Incorporated v. ClearOne

Beam microphone and DSP systems.

SyncPoint Imaging LLC v. Nintendo of America Inc., et al

Optics-based pointing systems.

* Prior firm experience

Patent Litigation: Design Patents, Toys, Lighting Systems and Sporting Goods

Daimler AG v. Amazon.com, Inc.

Design patents.

Juno Manufacturing, LLC v. Nora Lighting, Inc.

Recessed lighting systems.

Quintal Research v. Nintendo of America Inc.

Handheld computing devices.

Clark v. The Walt Disney Co.

Electronic art work.

Spiegel v. Pro Performance Sports LLC

Football tees.

*Patent Category Co. v. Target Stores, et al.**

Self-erecting structures.

*JAKKS Pacific Inc. v. Imperial Toy Company**

Elastomeric gels.

* Prior firm experience

Patent Litigation: Pharmaceutical and Healthcare

*Allergan Inc. v. Pharmacia Corporation**

Ophthalmic solutions.

*Optivus v. Ion Beam Applications, S.A.**

Proton beam therapy systems.

* Prior firm experience

Bar Admissions

- Washington
- California

Court Admissions

- U.S. District Court for the Western District of Washington
- U.S. District Court for the District of Colorado
- U.S. District Court for the Eastern District of California
- U.S. District Court for the Central District of California
- U.S. District Court for the Eastern District of Wisconsin
- U.S. District Court for the Northern District of California
- U.S. Court of Appeals for the Federal Circuit
- U.S. District Court for the Southern District of California
- U.S. District Court for the Eastern District of Texas

Education

- UCLA School of Law, J.D., 1994, Order of the Coif
- University of California, Los Angeles, B.A., Philosophy, 1991

Professional Leadership

- California Bar Association
- American Intellectual Property Law Association (AIPLA)

Professional Recognition

- Named a Southern California "Rising Star" by *Law & Politics Media Inc.*, 2007
- Named a Rising Star in Intellectual Property Litigation by *California Lawyer*, 2005, 2006