UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EXOTEC PRODUCT FRANCE SAS,
EXOTEC NORTH AMERICA INC., AND
EXOTEC PRODUCT USA INC.,
Petitioner

v.

OPEX CORPORATION
Patent Owner

Case IPR2024-00850

U.S. Patent No. 11,472,632

PATENT OWNER OPEX CORPORATION's
UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE*
OF GOUTAM PATNAIK

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

I. Statement of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 5 authorizing the parties to file motions for *pro hac vice* admission, Patent Owner Opex Corporation ("Opex") requests that the Patent Trial and Appeal Board (the "Board") admit Goutam Patnaik *pro hac vice* in this proceeding, IPR2024-00850. The Petitioner has indicated that they do not oppose this motion.

II. Statement Of Facts Showing Good Cause For The Board To Recognize Counsel *Pro Hac Vice* During The Proceeding

In accordance with 37 C.F.R. § 42.10(c), the 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. Section 42.10(c) indicates that "where 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 a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding." The facts here establish good cause for the Board to recognize Goutam Patnaik *pro hac vice* in this proceeding.

1. Lead counsel, Yung-Hoon Ha, is a registered practitioner.
2. Counsel, Goutam Patnaik, is an experienced litigator and has an established familiarity with the subject matter at issue in the proceeding. Accompanying this motion as Exhibit 2002 is the

Declaration of Goutam Patnaik in Support of this Motion for Admission Pro Hac Vice ("Patnaik Decl."). In his declaration, Mr. Patnaik asserts:

> I am a member in good standing of the Bar of New York.

Patnaik Decl. ¶ 2 (Ex. 2002).

Mr. Patnaik also demonstrates that he has a detailed working knowledge of the relevant subject matter. Patnaik Decl. ¶¶ 9-10 (Ex. 2002)

3. In his declaration, Mr. Patnaik also attests to each of the listed items required by the Order – Authorizing Motion for Pro Hac Vice Admission – 37 C.F.R. § 42.10 in IPR2013-00639. *See* Patnaik Decl. ¶¶ 1-11 (Ex. 2002). Mr. Patnaik attests that he has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R. § 42. *See id.* ¶ 7. Mr. Patnaik further attests that he agrees to be subject to the United States Patent and Trademark Office's Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 *et seq*. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *See id.* ¶ 8.

III. Conclusion

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Goutam Patnaik *pro hac vice* in this proceeding.

Dated: January 8, 2025

Respectfully submitted,

/Theodoros Konstantakopoulos/

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PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit No.	DESCRIPTION
2001	Declaration of Dr. William E. Singhose
2002	Declaration of Goutam Patnaik In Support Of Motion For Admission *Pro Hac Vice*

All citations to specific pages of exhibits follow the pagination added to those exhibits per 37 C.F.R. § 42.63(d)(2)(i).

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U.S. Patent No. 11,472,632

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on January 8, 2025, a complete copy of the foregoing was served on counsel of record for the Petitioner by filing this document through P-TACTS and by sending this document via electronic mail to the following addresses:

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