

Case IPR2024-00850
U.S. Patent No. 11,472,632

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 DAVID J. SHAW

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 David J. Shaw *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 David J. Shaw *pro hac vice* in this proceeding.

1. Lead counsel, Yung-Hoon Ha, is a registered practitioner.
2. Counsel, David J. Shaw, is an experienced litigator and has an established familiarity with the subject matter at issue in the proceeding. Accompanying this motion as Exhibit 2010 is the

Declaration of David J. Shaw in Support of this Motion for Admission
Pro Hac Vice (“Shaw Decl.”). In his declaration, Mr. Shaw asserts:

I am a member in good standing of the Virginia State Bar.

Shaw Decl. ¶ 2 (Ex. 2010).

Mr. Shaw also demonstrates that he has a detailed working knowledge
of the relevant subject matter. Shaw Decl. ¶¶ 9-10 (Ex. 2010).

3. In his declaration, Mr. Shaw 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* Shaw Decl. ¶¶
1-11 (Ex. 2010). Mr. Shaw 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. Shaw 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 David. J. Shaw *pro hac vice* in this proceeding.

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U.S. Patent No. 11,472,632
Dated: June 23, 2025

Respectfully submitted,

/Yung-Hoon Ha/
Yung-Hoon Ha (Reg. No. 56,368)
yha@desmaraisllp.com
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
212-351-3400 (telephone)
212-351-3401 (facsimile)

*Counsel for Patent Owner,
Opex Corporation*

PATENT OWNER'S UPDATED EXHIBIT LIST

OPEX Exhibit No.	DESCRIPTION
2001	Declaration of Dr. William E. Singhose
2002	Declaration of Goutam Patnaik In Support Of Motion For Admission <i>Pro Hac Vice</i>
2003	Matthew Spenko, Ph.D. <i>Curriculum Vitae</i>
2004	Nagai et al, "Fault-Free Integrity of Urban Driverless Vehicle Navigation with Multi-Sensor Integration: A Case Study in Downtown Chicago" October 2023
2005	Annotated Figure 1 from U.S. Patent Publication No. 2017/0158430 (Raizer)
2006	Deposition Transcript of Matthew Spenko, Ph.D., dated January 23, 2025
2007	Declaration of Dr. William E. Singhose Accompanying POR
2008	Hong et al, "Semi-automated approach to indoor mapping for 3D as-built building information modeling" May 2015
2009	Whyte, "Multipath Interference in Indirect Time-of-Flight Depth Sensors" March 2021
2010	Declaration of David J. Shaw In Support Of Motion For Admission <i>Pro Hac Vice</i>

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

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on June 23, 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:

John D. Haynes (Reg. No. 44,754)
Alston & Bird LLP
1201 West Peachtree Street,
Suite 4900
Atlanta, GA 30309-3424
Phone: 404.881.7000
Fax: 404-881-7777
Email: john.haynes@alston.com

Email:
Exotec-632IPR@alston.com

Brian C. Ellsworth (Reg. No. 50,813)
Christopher TL Douglas
(Reg. No. 56,950)
Alston & Bird LLP
Vantage South End 1
120 South Tryon Street, Suite 300
Charlotte, NC 28203-6818
Phone: 704.444.1000
Fax: 704.444.1111
Email: brian.ellsworth@alston.com
Email: Christopher.Douglas@alston.com

Dana M. Zottola (Reg. No. 65,942)
Alston & Bird LLP
560 Mission Street Suite 2100
San Francisco, CA 94105
Phone: 650.838.2044
Fax: 415.243.1001
Email: dana.zottola@alston.com

Dated: June 23, 2025

Respectfully submitted,

/Yung-Hoon Ha/
Yung-Hoon Ha (Reg. No. 56,368)
yha@desmaraisllp.com
DESMARAIS LLP

*Counsel for Patent Owner,
OPEX Corporation*