UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VUSIONGROUP SA,
Petitioner

v.

HANSHOW TECHNOLOGY CO. LTD.,
Patent Owner

Case: IPR2024-00857

Patent 11,540,216

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

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

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit Number	Description
2001	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 3), Patent Owner hereby moves for the admission of Christopher J. Fahy to appear *pro hac vice* on its behalf, as back-up counsel, before the Board in IPR2024-00857. 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. 11,540,216 (the "'216 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. 2001 (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).

In the last three (3) years, Mr. Fahy has applied to appear *pro hac vice* in the following proceedings before the Office: PGR2022-00050; IPR2024-00188; IPR2024-00189; and IPR2024-00208.

Accordingly, Patent Owner respectfully submits 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. 2001).

Dated: December 28, 2024

Respectfully submitted,

/Hao Tan/
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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December, 2024, a copy of the attached PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER J. FAHY, was served by electronic mail to the attorneys of record for Petitioner at the following addresses:

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