**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ARASHI VISION (U.S.) LLC (D/B/A INSTA360),
Petitioner,

v.

GOPRO, INC.,
Patent Owner.

Patent No. 11,336,832

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*Inter Partes* Review No. IPR2024-01052

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# PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF W. STELLA MAO UNDER 37 C.F.R. § 42.10(c)

# Petitioner's Exhibit List

| Exhibit Description | Exhibit # |
|---|---|
| U.S. Patent No. 11,336,832 to Stimm et al. | 1001 |
| Expert Declaration of Aggelos Katsaggelos | 1002 |
| File History of U.S. Patent No. 11,336,832 | 1003 |
| U.S. Patent Pub. No. 2005/0168583 to Thomason | 1004 |
| U.S. Patent Pub. No. 2015/0181123 to Pacurariu et al. | 1005 |
| U.S. Patent No. 10,778,896 to Watanabe | 1006 |
| International Publication No. WO 2015/183636 to Voss | 1007 |
| U.S. Patent No. 10,341,564 to Derbanne et al. | 1008 |
| K. Vanhemert, "Horizon App Solves the Dumbest Thing About Smartphone Video," https://www.wired.com/2014/01/camera-app-solves-single-dumbest-thing-smartphone-video/, Wired (Jan. 22, 2014.) | 1009 |
| B. Mayo, "Horizon for iPhone Always Records Landscape Video, Independent of Device Orientation," https://9to5mac.com/2014/01/14/horizon-for-iphone-always-records-landscape-video-independent-of-device-orientation/, 9to5Mac (Jan. 14, 2014.) | 1010 |
| Complaint, In the Matter of Certain Cameras, Camera Systems, and Accessories Used Therewith, Inv. No. 337-TA-1400, March 29, 2024 | 1011 |
| Exemplary Infringement Claim Chart for U.S. Patent No. 11,336,832, In the Matter of Certain Cameras, Camera Systems, and Accessories Used Therewith, Inv. No. 337-TA-1400, March 29, 2024 | 1012 |
| International Publication No. WO 2015/038180 to Voss | 1013 |

| **Exhibit Description** | **Exhibit #** |
|---|---|
| Declaration of Nathaniel E. Frank-White (for Vanhemert EX1009) | 1014 |
| Declaration of Nathaniel E. Frank-White (for Mayo EX1010) | 1015 |
| Declaration of W. Stella Mao "Mao Decl." | **1016 [NEW]** |

## I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioner Insta360 requests that the Board admit W. Stella Mao *pro hac vice* in this proceeding.

## 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, subject to the conditions set forth therein, and any others that the Board may impose. Petitioner sets forth these facts in support of this motion:

1. The undersigned contacted counsel for Patent Owner GoPro, who indicated that Patent Owner did not plan to oppose Ms. Mao's admission *pro hac vice*.

2. Lead counsel for Petitioner Alex S. Yap, is a registered practitioner.

3. Counsel, W. Stella Mao, is an experienced litigator and has established familiarity with the subject matter at issue in this proceeding. Accompanying this motion is **Exhibit 1016**, the Declaration of W. Stella Mao in Support of this Motion for Admission *Pro Hac Vice* ("Mao Decl."). In her declaration, Ms. Mao attests, among other things, that she is a member in good standing of the California Bar and several United States District Courts. Mao Decl. ¶¶ 1-2. Ms. Mao has 5 years of experience in patent litigation at all phases of the

litigation process from pre-filing investigations to jury trial, including drafting of pleadings, expert discovery, and specialized patent-related proceedings such as *Markman* hearings and invalidity contentions. Mao Decl. ¶ 8. In addition, Ms. Mao's familiarity with the subject matter at issue in this proceeding is demonstrated by her review of the '832 Patent, all cited prior art, and the IPR petition in this matter. Mao Decl. ¶ 9.

4. In her declaration, Ms. Mao also attests as to her admission to practice in other courts, as well as each of the required items set forth by 37 C.F.R. §42.10(c). *See* Mao Decl. ¶¶ 1-9.

## III. CONCLUSION

For the foregoing reasons, Petitioner respectfully request that the Board admit W. Stella Mao *pro hac vice* in this proceeding.

Date: April 1, 2025

Respectfully Submitted,

By: */Alex S. Yap/*

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**Certificate of Service (37 C.F.R. § 42.6(e)(4))**

I hereby certify that the attached PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF W. STELLA MAO UNDER 37 C.F.R. § 42.10(c) and the Supporting Declaration of W. Stella Mao, were served on the date listed below via email (by agreement) upon the following counsel of record for Patent Owner.

James M. Glass, Registration No. 46,729
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Dated: April 1, 2025

/*Alex S. Yap*/
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