

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GOPRO, INC.,
Patent Owner.

Patent No. 10,958,840 B2

Inter Partes Review No. IPR2024-01164

**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. 10,958,840 B2 to Douady <i>et al.</i>	1001
File History of U.S. Patent No. 10,958,840 B2	1002
Expert Declaration of Aggelos Katsaggelos	1003
Steven Bell, Alejandro Troccoli, and Kari Pulli, "A Non Linear Filter for Gyroscope-Based Video Stabilization," <i>ECCV (4)</i> , Vol. 8692 of <i>Lecture Notes in Computer Science</i> , pp. 294-308, Springer (2014).	1004
Scanned copy of Steven Bell, Alejandro Troccoli, and Kari Pulli, "A Non-Linear Filter for Gyroscope-Based Video Stabilization," <i>ECCV (4)</i> , Vol. 8692 of <i>Lecture Notes in Computer Science</i> , pp. 294-308, Springer (2014).	1005
U.S. Patent No. 10,027,893 to Bell <i>et al.</i>	1006
U.S. Patent No. 10,462,370 to Shi <i>et al.</i>	1007
U.S. Patent No. 8,994,838 to Sokeila <i>et al.</i>	1008
U.S. Patent No. 9,071,756 to Karpenko	1009
Declaration of Sylvia D. Hall-Ellis	1010
U.S. Patent Application Publication No. US 2013/0044228 A1 to Corey <i>et al.</i>	1011
U.S. Patent No. 8,531,535 to Kwatra <i>et al.</i>	1012
Complaint in Certain Cameras, Camera Systems, and Accessories Used Therewith, Inv. No. 337-TA-1400, March 2024	1013
'840 Patent Infringement Claim Chart in Certain Cameras, Camera Systems, and Accessories Used Therewith, Inv. No. 337-TA-1400, March 2024	1014

Exhibit Description	Exhibit #
U.S. Patent No. 9,674,438 to Zhou <i>et al.</i>	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 Insta360, 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 '840 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,

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Counsel for Petitioner

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.

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Dated: April 1, 2025

/Alex S. Yap/
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