

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner

v.

FACETEC, INC.,
Patent Owner

Patent No. 10,776,471

Inter Partes Review No. IPR2025-00106

**PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
KYLE W.K. MOONEY UNDER 37 C.F.R. § 42.10(c)**

**PETITIONER’S EXHIBIT LIST FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 10,776,471**

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U.S. Patent 9,077,891	1011
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Zhengyou Zhang et al., <i>A Robust Technique for Matching Two Uncalibrated Images Through the Recovery of the Unknown Epipolar Geometry</i> , Institut National De Recherche En Informatique Et En Automatique (May 1994)	1013
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Anil K. Jain et al., <i>Introduction to Biometrics</i> , Springer (2011)	1018
B. Honlinger & H.H. Nasse, <i>Distortion</i> , Zeiss (Oct. 2009)	1019
Hue and Hatchet, <i>What is the Focal Plane?</i> , https://hueandhatchet.com/what-is-the-focal-plane/	1020
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Richard Hartley & Andrew Zisserman, <i>Multiple View Geometry in Computer Vision</i> , Cambridge Univ. Press (2 nd ed. 2011)	1023
Daniel Moreno & Gabriel Taubin, <i>Simple, Accurate, and Robust Projector-Camera Calibration</i> , Brown Univ., mesh.brown.edu/calibration/	1024
Serge Belongie, <i>CSE 252B: Computer Vision II, Lecture 4: Planar Scenes and Homography</i> (Apr. 7, 2004)	1025
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Laurenz Wiskott, <i>Face Recognition by Elastic Bunch Graph Matching</i> (1999)	1027

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Axis Communications, <i>CCD and CMOS sensor technology: Technical White Paper</i> (2010)	1028
Jeff Meyer, <i>What is Depth of Field? How aperture, focal length and focus control sharpness</i> , Digital Camera World (July 17, 2013), https://prism.org.gg/wp-content/uploads/2016/07/Depth-of-Field.pdf	1029
Brian Klug, <i>Understanding Camera Optics & Smartphone Camera Trends, A Presentation by Brian Klug</i> , Anandtech (Feb. 22, 2013), https://www.anandtech.com/Show/Index/6777?cPage=2&all=False&sort=0&page=2&slug=understanding-camera-optics-smartphone-camera-trends	1030
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<i>The Timeline of Evolution of the Camera from the 1600s to 21st Century</i> , Capture.com (May 5, 2023), https://www.capture.com/blogs/insights/evolution-of-the-camera	1032
John Biggs, <i>A Nokia Camera Phone That's More Like a Camera With a Phone Attached</i> , The New York Times (Nov. 29, 2007), https://www.nytimes.com/2007/11/29/technology/personaltech/29phone.html	1033
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Zac Hall, <i>Over a decade of selfies, starting with iPhone 4</i> , 9to5Mac (July 1, 2021), https://9to5mac.com/2021/07/01/iphone-4-selfie-celebration/	1037

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Declaration of Jessica C. Kaiser	1049
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Board Email of April 30, 2025, authorizing Petitioner to file motion to withdraw counsel	1051
Supporting Declaration of Kyle W.K. Mooney for <i>Pro Hac Vice</i> Admission (“Mooney Decl.”)	1052 [NEW]

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioner Jumio Corporation requests that the Board admit Kyle W.K. Mooney *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 FaceTec, Inc. who indicated that Patent Owner did not plan to oppose Mr. Mooney's admission *pro hac vice*.

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

3. Counsel, Kyle W.K. Mooney, is an experienced litigator and has established familiarity with the subject matter at issue in this proceeding.

Accompanying this motion is **Exhibit 1052**, the Declaration of Kyle W.K. Mooney in Support of this Motion for Admission *Pro Hac Vice* ("Mooney Decl."). In his declaration, Mr. Mooney attests, among other things, that he is a member in good standing of the New York Bar and several United States District Courts. Mooney

Decl. ¶¶ 1-2. Mr. Mooney's has 23 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. Mooney Decl. ¶ 8. Mr. Mooney also has 23 years of industry experience with technologies related to those disclosed in the '471 Patent, such as computer hardware, software, imaging, image processing, etc. Mooney Decl. ¶ 9. In addition, Mr. Mooney's familiarity with the subject matter at issue in this proceeding is demonstrated by his review of the '471 Patent, all cited prior art, and the IPR petition in this matter. Mooney Decl. ¶ 9.

4. In his declaration, Mr. Mooney also attests as to his 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* Mooney Decl. ¶¶ 1-9.

III. Conclusion

For the foregoing reasons, Petitioner respectfully requests that the Board admit Kyle W.K. Mooney *pro hac vice* in this proceeding.

Date: August 28, 2025

Respectfully Submitted,

By: /s/ 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 KYLE W.K. MOONEY UNDER 37 C.F.R. § 42.10(C) and the SUPPORTING DECLARATION OF KYLE W.K. MOONEY, 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: August 28, 2025

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