

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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MICROBOARDS TECHNOLOGY, LLC d/b/a AFINIA,  
Petitioner,

v.

STRATASYS INC.,  
Patent Owner.

Patent No. 8,349,239

Filing Date: SEPTEMBER 23, 2009

Issue Date: JANUARY 8, 2013

Title: SEAM CONCEALMENT FOR THREE-DIMENSIONAL MODELS

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*INTER PARTES* REVIEW NO. IPR2015-00288

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION  
OF KENNETH A. LIEBMAN**

**I. Statement of Precise Relief Requested**

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 5 authorizing the patent owner to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), Patent Owner Stratasys Inc., requests that the Patent Trial and Appeal Board (the “Board”) admit Kenneth A. Liebman *pro hac vice* in this proceeding, IPR2015-00288.

This motion is being filed no sooner than twenty one (21) days after service of the petition.

**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 the Board may impose. Section 42.10(c) indicates that “where the 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 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 Kenneth A. Liebman *pro hac vice* in this proceeding.

1. Lead counsel, Walter C. Linder, is a registered practitioner.
2. Counsel, Kenneth A. Liebman, is an experienced litigator and has

an established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion as Exhibit 2002 is the Declaration of Kenneth A.

Liebman in Support of Motion for *Pro Hac Vice* Admission (“Liebman Decl.”).

In his declaration, Mr. Liebman asserts:

“I am a member in good standing of the Bars of Minnesota and California as well as the following Federal Courts:

- (a) U. S. District Court for Central District of California (01/15/1980);
- (b) U.S. Court of Appeals for the Eleventh Circuit (09/19/1991);
- (c) U.S. District Court for Northern District of California (08/13/1992);
- (d) U.S. Court of Appeals for the Federal Circuit (09/03/1993); and
- (e) U.S. District Court for District of Minnesota (11/05/1993).”  
(Liebman Decl., ¶ 2).

Mr. Liebman also asserts:

“I have been in private practice for over 33 years, and litigating patent cases for over 20 years. Several of these patent litigations involve USPTO post-grant procedures. Other proceedings before the Office for which I have applied to appear *pro hac vice* (and authorized to appear) in the last three years are *Inter Partes* Review Nos.: IPR2014-00191, IPR 2014-00311 and

IPR 2014-00321. Concurrently with this declaration, I am submitting declarations in connection with motions to appear *pro hac vice* in *Inter Partes* Review Nos.: IPR2015-00284 and IPR 2015-00287 that also relate to patents at issue in the litigation referred to in paragraph 10 below.

I am familiar with the subject matter at issue in this proceeding. I am trial counsel for the Patent Owner in the matter *Stratasys Inc. v. Microboards Technology, LLC*, No.0:13-cv-03228-DWF-JJG (filed on November 25, 2013), which is related to and involves the same patent at issue in this proceeding.” (Liebman Decl., ¶¶ 9-10).

3. In his declaration, Mr. Liebman also attests to each of the listed items required by the “Order – Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639, Paper 7. (See Liebman Decl., ¶¶ 1-11).

### III. Conclusion

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Kenneth A. Liebman *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: March 19, 2015

/Walter Linder/  
Walter C. Linder  
Reg. No. 31,707  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South 7<sup>th</sup> Street  
Minneapolis, MN 55402-3901  
Tel.: (612) 766- 7000  
Fax.: (612) 766-1600  
Lead Counsel for Petitioner

IPR2015-00288

U.S. Patent No. 8,349,239

Patent Owner's Motion for *Pro Hac Vice* Admission of Kenneth A. Liebman

### CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that I caused a true and correct copy of the Patent Owner's Motion for *Pro Hac Vice* Admission of Kenneth A. Liebman, and associated Exhibit 2002, to be served via electronic mail on the following:

William J. Cass  
Cantor Colburn LLP  
20 Church Street, 22<sup>nd</sup> Floor  
Hartford, Connecticut 06103  
[wcass@cantorcolburn.com](mailto:wcass@cantorcolburn.com)

Herbert M. Bedingfield  
Cantor Colburn LLP  
20 Church Street, 22<sup>nd</sup> Floor  
Hartford, Connecticut 06103  
[hbedingfield@cantorcolburn.com](mailto:hbedingfield@cantorcolburn.com)

Brad D. Pedersen  
Patterson Thunte Pedersen, P.A.  
80 South 8<sup>th</sup> Street, Suite 4800  
Minneapolis, MN 55402  
[prps@ptslaw.com](mailto:prps@ptslaw.com)

FAEGRE BAKER DANIELS LLP

Dated: March 19, 2015

By: / Walter Linder /  
Walter C. Linder  
Reg. No. 31,707  
Customer No. 25764  
Telephone: (612) 766-8801

Faegre Baker Daniels LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600