

Case No. IPR2016-00291

U.S. Patent No. 5,732,375

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION

Petitioner

Patent No. 5,732,375

Issue Date: March 24, 1998

Title: METHOD OF INHIBITING OR ALLOWING AIRBAG DEPLOYMENT

Case No. IPR 2016-00291

**MOTION FOR *PRO HAC VICE* ADMISSION
OF MARK A. CHAPMAN**

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Toyota Motor Corporation (“Toyota”) respectfully requests the *pro hac vice* admission of Mark A. Chapman as backup counsel for Toyota in the current proceedings.

In support of this motion, a declaration of Mark A. Chapman is submitted as Exhibit 1013 explaining that he satisfies the criteria for *pro hac vice* admission as set forth in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (Oct. 15, 2013).

1. Statement of Facts

1. Lead counsel, John Flock, is a registered practitioner.
2. Mr. Chapman is a litigation attorney experienced in patent cases and is a member in good standing of the New York Bar. He has not had any application denied for admission to practice, nor has he been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.
3. Mr. Chapman has an established familiarity with the subject matter at issue in this proceeding, including U.S. Patent No. 5,732,375 (“the ’375 patent”), the petition for *inter partes* review, and the supporting expert declaration submitted by Petitioner in this matter as shown in his accompanying May 3, 2016 Declaration (“Chapman Declaration,” Ex. 1013).

4. In his declaration, Mr. Chapman also attests to each of the listed items required by the Order – Authorizing Motion for Pro Hac Vice Admission – 37 C.F.R. § 42.10 in IPR2013-00639. Chapman Declaration ¶¶ 1-11 (Ex. 1013).

2. Conclusion

For the foregoing reasons, Toyota respectfully requests that the Board admit Mark A. Chapman *pro hac vice* in this proceeding.

Date: May 3, 2016

Respectfully submitted,

/ John Flock /
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Certificate of Service

The undersigned hereby certifies that the foregoing *MOTION FOR PRO HAC VICE* ADMISSION OF MARK A. CHAPMAN and Exhibit 1013 were served via e-mail on May 3, 2016, in their entirety on the following:

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