

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTIF FOODWORKS, INC.,

Petitioner,

v.

IMPOSSIBLE FOODS INC.,
Patent Owner.

Case No.: IPR2023-00206
U.S. Patent No. 9,943,096

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF DEREK A. HUISH UNDER 37 C.F.R. § 42.10(c)**

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10(c), Petitioner Motif FoodWorks, Inc. requests that the Board admit Derek A. Huish *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 Impossible Foods Inc. Tasha Thomas indicated that Patent Owner does not oppose Mr. Huish's admission *pro hac vice*.

2. Lead counsel for Petitioner in this matter, Joseph Paunovich, is a registered practitioner.

3. Accompanying this motion is Exhibit 1179, the Declaration of Derek A. Huish in Support of Motion for Admission Pro Hac Vice in this proceeding. In his declaration, Mr. Huish attests, among other things, that he is an attorney at Quinn Emanuel Urquhart & Sullivan, LLP and is an experienced litigator. He is admitted to and a member in good standing of the Utah State Bar and Iowa State Bar. Mr. Huish has been practicing law since 2019 and has had experience with patent infringement cases as a judicial law clerk and practitioner over the past four years.

His experience includes drafting pleadings, expert discovery, and specialized patent-related proceedings, such as *Markman* briefing and invalidity contentions.

4. Mr. Huish also has established familiarity with the subject matter at issue in this proceeding and related co-pending litigation. He is concurrently seeking admission as counsel of record for Defendant Motif (Petitioner) in the parallel district court litigation captioned *Impossible Foods Inc. v. Motif FoodWorks, Inc.*, C.A. No. 22-311 (CFC) (D. Del.). He has been involved with forming invalidity positions against U.S. Patent No. 9,943,096, the patent challenged in this IPR, and he has acquired a substantial understanding of the underlying legal and technological issues at stake in these proceedings.

III. Conclusion

For the foregoing reasons, Petitioner respectfully requests that the Board admit Derek A. Huish *pro hac vice* in this proceeding.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certify that Petitioner's Unopposed Motion For Pro Hac Vice Admission of Derek A. Huish, and all exhibits filed together with the this Motion, were served on Patent Owner on August 4, 2023 by e-mailing copies to:

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Date: August 4, 2023

Respectfully submitted,

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