

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UV Engineering Solutions LLC
Petitioner,

v.

TROJAN TECHNOLOGIES GROUP, ULC
Patent Owner.

Case IPR2023-01015
U.S. Patent No. 8,167,654

**PETITIONER'S UNOPPOSED MOTION FOR ADMISSION
PRO HAC VICE OF STEVEN E. LAURIDSEN**

I. RELIEF REQUESTED

Pursuant to 37 U.S.C. § 42.10(c), Petitioner UV Engineering Solutions LLC petitions for admission *pro hac vice* of its attorney Steven E. Lauridsen.

II. GOVERNING LAW, RULES, AND PRECEDENT

Whether to admit counsel *pro hac vice* in a Board proceeding is governed by 37 C.F.R. § 42.10(c), which provides:

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 as the Board may impose. For example, 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 Board has stated that a motion for admission *pro hac vice* must include a “statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding,” and “[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:

- i. Membership in good standing of the Bar of at least one State or the District of Columbia;
- ii. No suspensions or disbarments from practice before any court or administrative body;

- iii. No application for admission to practice before any court or administrative body ever denied;
- iv. No sanctions or contempt citations imposed by any court or administrative body;
- v. The individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.;
- vi. The individual will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);
- vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and
- viii. Familiarity with the subject matter at issue in the proceeding."

Unified Patents, Inc. v. Parallel Iron, LLC, IPR 2013-00639 (MPT) (Paper 7 at 34).

III. STATEMENT OF FACTS

Petitioner submits that the following facts demonstrate good cause for admitting Mr. Lauridsen *pro hac vice* for purposes of this proceeding. Each of these facts is supported by Mr. Lauridsen's declaration under penalty of perjury submitted with this motion.

1. Mr. Lauridsen has more than 16 years of experience as a litigation attorney. Since 2006, he has specialized in intellectual property litigation, representing clients in patent litigation matters in various United States District Courts, and before the United States Court of Appeals for the Federal Circuit and the International Trade Commission.

2. Mr. Lauridsen is familiar with U.S. Patent No. 8,167,654 (the “654 Patent”) and its file history, and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner’s Request for *Inter Partes* Review of the ‘654 Patent that forms the basis for this proceeding. Mr. Lauridsen has studied the ‘654 Patent, its file history, and the pertinent prior art. Mr. Lauridsen has also represented third parties in previous patent litigation concerning the same technical subject matter at issue here.

3. Mr. Lauridsen is a member in good standing of the Bar of the State of California. He is admitted to practice before the United States Court of Appeals for the Federal and Ninth Circuits; the United States District Court for the Central, Northern, Southern, and Eastern Districts of California; and the United States District Court for the Western District of Wisconsin.

4. Mr. Lauridsen has never been suspended or disbarred from practice before any court or administrative body.

5. Mr. Lauridsen has never had a court or administrative body deny an application for admission to practice.
6. Mr. Lauridsen has never been sanctioned or cited for contempt by any court or administrative body.
7. Mr. Lauridsen has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
8. Mr. Lauridsen agrees to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
9. Mr. Lauridsen has not been admitted *pro hac vice* as counsel before the PTAB in any action in the last three years.

IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. LAURIDSEN IN THIS PROCEEDING

As noted, 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 any other conditions the Board may impose. 37 C.F.R. § 42.10(c). Petitioner's lead counsel in this matter, J. Derek Mason (Reg. No. 35270), is a registered practitioner. Based on the facts contained in this motion, good cause exists to admit Mr. Lauridsen *pro hac vice*.

Mr. Lauridsen is an experienced litigator with almost 17 years of litigation experience, all of which has been devoted to patent and other intellectual property litigation. During this time, Mr. Lauridsen has represented clients in the lighting industry, including UV lighting for disinfecting purposes (the specific technology at issue here). He has been trial counsel and argued before the Federal Circuit in patent litigation matters. He is well-versed in the law, the industry, and the technology at issue here. For all of these reasons, Petitioner submits that good cause exists for the Board to admit Mr. Lauridsen *pro hac vice* for purposes of this proceeding. Petitioner contacted Patent Owner's counsel regarding this motion, and counsel stated he did not object Mr. Lauridsen's *pro hac vice* admission.

V. CONCLUSION

Petitioner's lead counsel is registered with the United States Patent and Trademark Office, and good cause exists to admit his co-counsel, Steven E. Lauridsen, *pro hac vice*. The motion is unopposed, and Petitioner requests that the Board grant the motion so that Petitioner's counsel of choice may appear and actively participate in this proceeding.

Dated: August 23, 2023

Respectfully submitted,

/J. Derek Mason/

J. Derek Mason, Reg. No. 35,270
TUCKER ELLIS LLP
1399 New York Ave NW, Suite 350
Washington, DC 20005-4733
Telephone: 202.505.6341
Facsimile: 202.505.6410
derek.mason@tuckerellis.com
Attorney for Petitioner

Steven E. Lauridsen, *pro hac vice*
anticipated
TUCKER ELLIS LLP
515 South Flower Street, 42nd Floor
Los Angeles, CA 90071
Telephone: 213.430.3377
Facsimile: 213.430.3409
steven.lauridsen@tuckerellis.com
Backup Counsel

**DECLARATION OF STEVEN E. LAURIDSEN IN SUPPORT OF
UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE***

I, Steven E. Lauridsen, under penalty of perjury, hereby attest to the following:

1. I am a member in good standing of the Bar of the State of California. I am admitted to practice before the United States Court of Appeals for the Federal and Ninth Circuits; the United States District Court for the Central, Northern, Southern, and Eastern Districts of California; and the United States District Court for the Western District of Wisconsin.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never had a court or administrative body deny an application for admission to practice.
4. I have never been sanctioned or cited for contempt by any court or administrative body.
5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
6. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I have not been admitted *pro hac vice* as counsel before the PTAB in any action in the last three years.

8. I am familiar with U.S. Patent No. 8,167,654 (the “654 Patent”) and its file history, and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner’s Request for *Inter Partes* Review of the ‘654 Patent that forms the basis for this proceeding. I have studied the ‘654 Patent, its file history, and the pertinent prior art. I have also represented third parties in previous patent litigation concerning the same technical subject matter at issue here. Further, I have more than 16 years of experience as a litigation attorney. Since 2006, I have specialized in intellectual property litigation, representing clients in patent litigation matters in various United States District Courts, and before the United States Court of Appeals for the Federal Circuit and the International Trade Commission.

Dated: August 23, 2023

Respectfully submitted,

/Steven E. Lauridsen/
Steven E. Lauridsen
TUCKER ELLIS LLP
515 South Flower Street, 42nd Floor
Los Angeles, CA 90071
Telephone: 213.430.3377
Facsimile: 213.430.3409
steven.lauridsen@tuckerellis.com

Certificate of Service 37 C.F.R. §§ 42.6(e)

The undersigned certifies that on August 23, 2023, I will cause true and correct copies of the foregoing Petitioner's Unopposed Motion for Admission *Pro Hac Vice* of Steven E. Lauridsen, and Petitioner's Declaration of Steven E. Lauridsen in Support of Unopposed Motion for Admission *Pro Hac Vice*, to be provided by email to the Patent Owner by serving correspondence to the addresses of record as follows:

Steven E. Feldman, Reg. No. 40,604
SFeldman@hahnlaw.com

Walter J. Kawula, Reg. No. 39,724
WKawula@hahnlaw.com

Sherry L. Rollo, Reg. No. 61,447
SRollo@hahnlaw.com

Joel S. Sonnenberg, Reg. No. 70,766
JSonnenberg@hahnlaw.com

Dated: August 23, 2023

Respectfully submitted,

/J. Derek Mason/
J. Derek Mason, Reg. No. 35,270
TUCKER ELLIS LLP
1399 New York Ave NW, Suite 350
Washington, DC 20005-4733
Telephone: 202.505.6341
Facsimile: 202.505.6410
derek.mason@tuckerellis.com
Attorney for Petitioner