

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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BILLERUD AKTIEBOLAG (PUBL)  
Petitioner,

v.

WESTROCK MWV, LLC.  
Patent Owner

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Case No. IPR2023-01206  
Patent No. 11,293,142 B2

**PETITIONER'S MOTION FOR  
*PRO HAC VICE* ADMISSION OF THAD M. BARNES**

**I. RELIEF REQUESTED**

Pursuant to the Board’s authorization for the parties to file motions for *pro hac vice* admission under 37 CFR §42.10(c) in the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response of July 31, 2023 (the “Notice”), Petitioner Billerud Aktiebolag (Publ) requests that the Board admit Thad M. Barnes *pro hac vice* in this proceeding. In support of this motion, Petitioner states as follows:

**II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THE PROCEEDING**

1. This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty-one (21) days after the service of the Petition in this proceeding.
2. Lead counsel, Richard S. Myers, Jr., is a registered practitioner (Reg. No. 42,022) as is back-up counsel Terry Wright (Reg. No. 57,992) and Steve Weyer (Reg. No. 43,259).
3. Thad M. Barnes, is an experienced litigator who has been in private practice since October 1993 and has been litigating patent cases for the past 15 years. He has represented clients in numerous actions involving patent infringement and validity assertions and, as indicated in the Declaration of Thad M. Barnes (“Barnes Declaration”; Exhibit 1011) being filed in support of this Motion, he is a member in good standing of the Bars of the State of Kentucky and State of Tennessee. He is also admitted to practice before the United States Court of Appeals for the Third, Sixth, and Seventh Circuits, and the United States District Courts for the Eastern and Western Districts of Kentucky, and the Western District of Tennessee.

4. Mr. Barnes has an established familiarity with the subject matter at issue in the proceeding and Petitioner thus wishes to use Mr. Barnes as counsel in this proceeding. He is well-familiar with U.S. Patent No. 11,293,142 and has extensively reviewed and analyzed the patent at issue, the prosecution history, as well as all presently-cited prior art and other papers and exhibits filing in connection with this proceeding.

5. Mr. Barnes, in his Declaration being submitted with this Motion, also attests to each of the listed items required by 37 CFR §42.10(c).

### III. CONCLUSION

In view of the foregoing, Petitioner Billerud Aktiebolag (Publ) respectfully submits that there is good cause for and respectfully requests that the Board recognize and admit Thad M. Barnes as counsel *pro hac vice* in this proceeding.

Dated: May 11, 2024

Respectfully submitted,

/terry l. wright/

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Billerud Aktiebolag (Publ)

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. §42.6(e), the undersigned hereby certifies that service of this Motion for *Pro Hac Vice* Admission was made on the counsel of record for the Patent Owner by filing this document with the Patent Trial and Appeal Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy of via electronic mail to the following counsel of record for Patent Owner:

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Dated: May 11, 2024

/terry l. wright/  
Terry L. Wright  
Reg. No. 57,992  
Richard S. Myers, Jr.  
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