

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COLGATE-PALMOLIVE COMPANY,
Petitioner,

v.

NOBLE INNOVATIONS NC L.L.C.,
Patent Owner

IPR2023-01254
U.S. Patent No. 8,881,332

**DECLARATION OF MICHAEL C. WILSON IN SUPPORT OF
PETITIONER COLGATE-PALMOLIVE COMPANY'S MOTION FOR
PRO HAC VICE ADMISSION**

I, Michael C. Wilson, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the State Bar of Texas. My Texas Bar No. is 21704590. I am also admitted to practice in the United States Court of Appeals for the 5th Circuit and the United States Court of Appeals for the Federal Circuit, as well as the United States District Courts for the Northern District of Texas, the Eastern District of Texas, the Western District of Texas, and the Southern District of Texas.

2. I have not been suspended or disbarred from practice before any court or administrative body.

3. I have never had an application for admission to practice before any court or administrative body denied.

4. No sanctions or contempt citations have been imposed against me 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 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).

7. In the last three (3) years, I have applied to appear, and was granted permission to appear, *pro hac vice* in IPR2022-00066 (See Paper No. 15), IPR2022-00067 (See Paper No. 14), and PGR2022-00030 (See Paper No. 13).

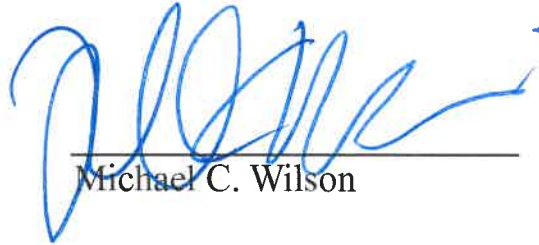
8. I have also appeared *pro hac vice* in other proceedings before the Board dated greater than three years ago, including IPR2015-00105, IPR2015-00106, IPR2015-00109, IPR2015-00112, IPR2015-00113, and IPR2015-00115.

9. I am an experienced litigation attorney, with 17 years of experience litigating patent cases in federal courts. My experience includes representing a wide range of clients in complex intellectual property litigation.

10. I have worked with lead counsel in most aspects of his participation in this proceeding. I also have represented Petitioner in the related patent infringement lawsuit, *Noble Innovations NC L.L.C. v. Colgate-Palmolive Company, et al.*, Case No. 8:22-cv-03373-PX (D. Md.) (filed December 30, 2022). As such, I have reviewed and am very familiar with (i) U.S. Patent No. 8,881,332, the patent at issue in this proceeding, (ii) the prior art relied upon in Colgate's Petition, (iii) the legal and factual arguments made by Colgate, and (iv) the developments in this proceeding after the filing of Colgate's Petition. I have also been involved in a number of other proceedings before the Board and I am familiar with its established practices.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: December 5, 2023



Michael C. Wilson