

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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COLGATE-PALMOLIVE COMPANY,  
Petitioner,

v.

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

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

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**PETITIONER COLGATE-PALMOLIVE COMPANY'S MOTION FOR  
*PRO HAC VICE* ADMISSION OF JARED M. HOGGAN**

Petitioner Colgate-Palmolive Company (“Petitioner” or “Colgate”) respectfully requests that the Patent Trial and Appeal Board (“Board”) recognize Jared M. Hoggan, Esq. as *pro hac vice* and backup counsel for Petitioner in this proceeding.

## **I. BACKGROUND**

Petitioner’s Motion for *Pro Hac Vice* Admission is being filed pursuant to and in compliance with the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, which was issued August 24, 2023 (Paper No. 3) (the “Notice”). The Notice authorizes parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c). Further to the Notice, such “motions shall be filed in accordance with the ‘Order -- Authorizing Motion for *Pro Hac Vice* Admission’ in Case IPR2013-00639, Paper 7” (the “Order”).

## **II. TIME OF FILING**

This Motion for *Pro Hac Vice* admission is being filed in accordance with the Notice and the Order, and is being filed greater than 21 days after service of the Petition.

## **III. STATEMENT OF FACTS**

As required by the Order, the following statement of facts, supported by the attached Declaration of Jared M. Hoggan in Support of Motion for *Pro Hac Vice*

Admission (Ex. 1017), shows that there is good cause for the Board to recognize Mr. Hoggan *pro hac vice* in this proceeding.

As required by 37 C.F.R. § 42.10(c), Petitioner's lead counsel, Keith D. Harden, is a registered practitioner experienced in proceedings before the USPTO.

Mr. Hoggan is an experienced litigation attorney. Mr. Hoggan has been a litigating attorney for more than 15 years, and has been involved in numerous patent litigation cases in federal courts. Although Mr. Hoggan has not appeared in a proceeding before the PTAB, Mr. Hoggan's experience includes representing a wide range of clients in complex intellectual property litigation.

Mr. Hoggan is a member in good standing of the Texas State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is 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. His mailing address is at Munck Wilson Mandala, 12770 Coit Road, Suite 600, Dallas Texas, 75251. His email address and telephone number are [jhoggan@munckwilson.com](mailto:jhoggan@munckwilson.com), (972) 628-3600.

Mr. Hoggan has worked with lead counsel in most aspects of his participation in this proceeding. As such, he has reviewed and is 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 that have been addressed by Colgate, and (iv) the developments in this proceeding since the filing of Colgate's Petition. Accordingly, he has established familiarity with the subject matter at issue in these proceedings and the conduct of these proceedings to date.

Mr. Hoggan has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§11.01 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

#### **IV. CONCLUSION**

Therefore, Petitioner respectfully submits that the facts contained in the Statement of Facts above, and contained in the Hoggan Declaration (Ex. 1017), establish that there is good cause to admit Mr. Hoggan *pro hac vice* in this proceeding as backup counsel under 37 C.F.R. § 42.10(c).

Dated: March 21, 2024

Respectfully submitted,

By: /Keith D. Harden/  
Keith D. Harden  
Registration No. 74,472

## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that a copy of the foregoing PETITIONER’S MOTION FOR PRO HAC VICE ADMISSION OF JARED M. HOGGAN and any accompanying exhibits was served on March 21, 2024 by electronic mail on the following counsel for Patent Owner:

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Dated: March 21, 2024

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