

UNITED STATES PATENT AND
TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPTICIS CO., LTD

Petitioner,

v.

INNEOS LLC,

Patent Owner.

Case No. IPR2023-01256
U.S. Patent No. 7,198,416

**PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF
CHRISTIAN E. MAMMEN PURSUANT TO 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10, Patent Owner, Inneos LLC, respectfully requests the Board to recognize Christian E. Mammen as *pro hac vice* counsel for the Patent Owner in this proceeding.

Counsel for Patent Owner conferred with counsel for Petitioner prior to filing this motion, and Petitioner does not oppose this motion.

I. Time for Filing

Pursuant to Paper 7, “Order Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639 (“Order”) and Paper 3, Notice of Filing Date Accorded to Petition in the present case (Case IPR2023-01256) (“Notice”), this motion for *pro hac vice* admission is authorized and is being filed no sooner than twenty-one (21) days after service of the petition.

II. Good Cause for Additional Back-Up Counsel

Patent Owner respectfully requests admission of Mr. Mammen as additional back-up counsel to provide additional expertise during this process, particularly due to his familiarity with the substantive and technical issues involved in this proceeding. Mr. Mammen is lead counsel in the related district court litigation concerning the ’416 Patent.

III. Statement of Facts

Pursuant to the Order, the following statement of facts, supported by the attached Declaration of Mr. Mammen, show that there is good cause for the Board to recognize Mr. Mammen *pro hac vice*.

Lead counsel for this proceeding, Barry J. Herman, is a registered practitioner (Reg. No. 51,254).

Mr. Mammen is an experienced litigation attorney, and has served as trial counsel in numerous complex cases and patent infringement litigations in various districts.

Mr. Mammen has not been suspended or disbarred from practice, and he has not had any application for admission of practice denied, or had any sanctions or contempt citations imposed against him.

Mr. Mammen is an active member in good standing of the bars of California, Oregon, and Washington, and is admitted to practice before the Supreme Court of the United States, the United States Courts of Appeals for the Ninth and Federal Circuits, the Northern, Central, Eastern and Southern Districts of California, the District of Oregon, and the Western District of Washington.

Mr. Mammen's mailing address is Womble Bond Dickinson (US) LLP, 50 California Street, Suite 2750, San Francisco, California 94111. His email address is Chris.Mammen@wbd-us.com and his direct dial phone number is 415-765-6267.

Mr. Mammen has worked with the Patent Owner in the past and is extremely familiar with the technology at issue in the petition. He is familiar with the patent at issue and has extensive knowledge of the assertions regarding validity of the challenged and the proposed amended claims. He is also familiar with the Patent Owner's overall legal strategies and has in-depth knowledge of issues that may arise over the course of the proceeding. Mr. Mammen has established familiarity with the subject matter at issue in this proceeding.

Mr. Mammen 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 the C.F.R., and he agrees to 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). Mr. Mammen has appeared in two other proceedings before the United States Patent and Trademark Office in the last three (3) years: *Yantai Jereh v. BJ Energy Solutions*,

et al., Case No.: PGR2021-00102, and *Yantai Jereh v. BJ Energy Solutions*, et al., Case No.: PGR2021-00103.

Patent Owner relies on Mr. Mammen in the development of its legal strategy with respect to this patent, and Patent Owner wishes Mr. Mammen to represent it in this proceeding.

IV. Affidavit or Declaration of Individual Seeking to Appear

This motion for *pro hac vice* admission is accompanied by a Declaration of Mr. Mammen as required by the Order.

V. Conclusion

The facts contained in the Statement of Facts above, and contained in the Declaration of Mr. Mammen, establish that there is good cause to admit Mr. Mammen *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c).

Respectfully submitted,

Dated: September 19, 2023

By: /Barry J. Herman/

Barry J. Herman
Registration No. 51,254

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on September 19, 2023 that a true and correct copy of the foregoing was served on Counsel for Petitioner via filing through the P-TACTS System, as well as by delivering a copy via electronic mail to the following:

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/s/ Barry J. Herman

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