

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAFE HAVEN WILDLIFE REMOVAL AND
PROPERTY MANAGEMENT EXPERTS LLC,

Petitioner

v.

MERIDIAN WILDLIFE SERVICES LLC.

Patent Owner

Case: IPR2023-01340
Patent No. 9,943,073

**PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF
JOHN F. MORROW, JR. PURSUANT TO 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10, Petitioner, Safe Haven Wildlife Removal and Property Management Experts LLC, respectfully requests the Board to recognize John F. Morrow, Jr. as *pro hac vice* counsel for the Petitioner in this proceeding.

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 IPR2023-01341) (“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

Petitioner respectfully requests admission of Mr. Morrow as back-up counsel to provide additional expertise during this process, particularly due to his familiarity with the substantive, technical and legal issues involved in this proceeding.

III. Statement of Facts

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

Lead counsel for this proceeding, Preston H. Heard, is a registered practitioner (Reg. No. 64,675).

Mr. Morrow is an experienced intellectual property litigation attorney and has served as lead counsel in numerous complex patent infringement litigations in various districts.

Mr. Morrow 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. Morrow is an active member in good standing of the bar of North Carolina, and is admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Sixth Circuit, the United States District Court for the Western District of North Carolina, the United States District Court for the Eastern District of North Carolina, and the United States District Court for the Middle District of North Carolina.

Mr. Morrow's mailing address is Womble Bond Dickinson (US) LLP, One West Fourth Street, Winston-Salem, NC 27101. His email address is John.Morrow@wbd-us.com, and his direct dial phone number is 336-721-3584.

Mr. Morrow has worked extensively with the Petitioner in the past and is familiar with the specific 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 claims. He is also familiar with the Petitioner's overall legal

strategies and has in-depth knowledge of issues that may arise over the course of the proceeding. Mr. Morrow has established familiarity with the subject matter at issue in this proceeding.

Mr. Morrow 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. Morrow has not appeared in other proceedings before the United States Patent and Trademark Office in the last three (3) years.

Petitioner relies on Mr. Morrow in the development of its legal strategy with respect to this patent, and Petitioner wishes Mr. Morrow 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. Morrow as required by the Order, filed as Exhibit 1019.

V. Conclusion

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

Respectfully submitted,

Dated: September 18, 2023

By: /Preston H. Heard/

Preston H. Heard

Reg. No. 64,675

Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that on September 18, 2023 that a true and correct copy of the foregoing was served on Counsel for Patent Owner via filing through the P-TACTS System, as well as by delivering a copy via electronic mail to the following:

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