

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRUCTURAL WRAP, LLC,
Petitioner

v.

SYSTEM STORMSEAL PTY LTD,
STORMSEAL USA, LLC,
Patent Owner

Case IPR2024-00084
U.S. Patent 11,168,484

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
TRAVIS LEE RICHINS UNDER 37 C.F.R. § 42.10(c)**

Pursuant to § 37 C.F.R. § 42.10(c), Patent Owner respectfully requests *pro hac vice* admission of Travis Lee Richins in this proceeding.

I. THE REQUEST IS TIMELY

Pursuant to the Board’s “NOTICE OF FILING DATE ACCORDED TO PETITION AND TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE,” dated November 13, 2023 (Paper No. 3), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), Patent Owner respectfully requests that the Board allow Travis Lee Richins to appear *pro hac vice* on its behalf in this proceeding. Petitioner consents to this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37C.F.R. § 42.10(c), Petitioner has demonstrated good cause to admit Mr. Richins *pro hac vice* in this proceeding. In particular, Patent Owner’s lead counsel is a registered practitioner, and Mr. Richins is an experienced litigation attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty-one days after service of the petition; includes a statement of facts showing good cause for the Board to recognize Mr. Richins *pro hac vice*; and is being filed concurrently with Exhibit 1, the Declaration of Travis Lee Richins in Support of Patent Owner's Motion for *Pro Hac Vice* Admission of Travis Lee Richins (“Richins Decl.”), all in

accordance with the “Order Authorizing Motion for *Pro Hac Vice Admission*” in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c) provides that “[t]he Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.”

2. Ryan Loveless, lead counsel for Patent Owner in this proceeding, is a registered practitioner holding Registration No. 51,970.

3. As set forth in the Richins Declaration, Mr. Richins is an experienced litigation attorney. Specifically, Mr. Richins has seven years of experience representing clients in patent litigation in United States district courts. (Richins Decl., ¶ 2).

4. Mr. Richins also has an established familiarity with the precise subject matter at issue in this proceeding. Patent Owner has asserted against Petitioner U.S.

Patent No. 11,168,484 (“the ’484 patent”), the patent at issue in this proceeding. In the course of this representation, he has developed a strong familiarity with the ’484 patent and the issues that may arise in this IPR. (Richins Decl., ¶ 5).

5. Mr. Richins has attested to each of the requirements set forth in paragraph 2(b)(i)-(viii) of the “Order Authorizing Motion for Pro Hac Vice Admission” in Case IPR2013-00639, Paper 7. (Richins Decl., ¶¶ 3-10).

6. The Commissioner is hereby authorized to charge all fees due in connection with this *pro hac vice* application to Attorney Deposit Account 600387.

IV. CONCLUSION

In view of the foregoing, Patent Owner respectfully submits that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and requests an Order permitting Travis Lee Richins to appear *pro hac vice* on its behalf in this proceeding.

Dated: December 1, 2023

/Ryan Loveless/

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CERTIFICATE OF SERVICE

I certify that the foregoing was served on Petitioner's counselors of record via electronic mail to the addresses identified in Petitioner's Mandatory Notices:

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