UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS INC.

Petitioners

v.

MONARCH NETWORKING SOLUTIONS LLC

Patent Owner

Case IPR2024-00175
Patent 8,693,369

PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF WILLIAM B. COLLIER, JR. PURSUANT TO 37 C.F.R. § 42.10(c)

I. Relief Requested

Pursuant to 7 C.F.R. § 42.10, Patent Owner Monarch Networking Solutions LLC ("Monarch") requests that the Board recognize William B. Collier, Jr. as counsel *pro hac vice* during this proceeding.

II. Governing Authority

Under 37 C.F.R. § 42.10(c), "[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." The Board's Notice of Filing Date in this proceeding authorized the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c) and advised that any such motion should be filed in accordance with the "'Order -- Authorizing Motion for *Pro Hac Vice* Admission' in Case IPR2013-00639, Paper 7, a copy of which is available on the Board Web site under 'Representative Orders, Decisions, and Notices.'" The IPR 2013-00639 order requires that a motion for *pro hac vice* admission:

a. Contain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding.

b. Be accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear has 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.;

vi. The individual 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);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

III. Good Cause Exists to Grant this Motion

The following facts, supported by the Declaration of William B. Collier, Jr. (EX2012), establish good cause to admit Mr. Collier *pro hac vice* in this proceeding:

i. Mr. Collier is a member in good standing of the State Bar of Texas and has been admitted to practice before the United States District Court for the Southern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Northern District of Texas, and the United States District Court for the Eastern District of Texas.

ii. Mr. Collier has never been suspended or disbarred from practice before any court or administrative body.

iii. No application filed by Mr. Collier for admission to practice before any court or administrative body has ever been denied.

iv. No sanctions or contempt citations have been imposed against Mr. Collier by any court or administrative body.

v. Mr. Collier has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials.

vi. Mr. Collier is applying to appear before the Office *pro hac vice* in the following proceedings: *Juniper Networks, Inc. v. Monarch Networking Solutions LLC* (IPR2024-00175) and *Juniper Networks, Inc. v. Monarch Networking*

Solutions LLC (IPR2024-00565). Other than these current proceedings, Mr. Collier previously applied to appear *pro hac vice* before the Office in two other matters was granted such appearance in each matter: *Sercomm Corp. v. Atlas Global Technologies, LLC* (IPR2022-01520) and *Unified Patents LLC v. Monarch Networking Solutions, LLC* (IPR2020-01708) within the last three years.

vii. Mr. Collier is an experienced litigation attorney who has served as counsel in numerous patent infringement cases in various district courts over the past eight years. Mr. Collier has an established familiarity with the patent at issue in this IPR, as he is counsel for Monarch in related district court litigations. He has carefully studied the patent-in-suit, including its prosecution history and related prior art. Additionally, Mr. Collier has a bachelor's degree in aerospace engineering and several years of relevant litigation experience in the fields of wireless communications and wireless networking.

If admitted, Mr. Collier will serve as backup counsel for Monarch lead counsel R. Allan Bullwinkel. Mr. Bullwinkel is a registered practitioner, as required by 37 C.F.R. § 42.10(c).

Dated: March 7, 2024

/R. Allan Bullwinkel/

R. Allan Bullwinkel (Reg. No. 77,630)
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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF WILLIAM B. COLLIER, JR., PURSUANT TO 37 C.F.R. § 42.10(c) was served to the following lead counsel of record for Petitioner as follows:

Lead Counsel for Petitioner	
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Dated: March 7, 2024

By: / R. Allan Bullwinkel /
R. Allan Bullwinkel (Reg. No. 77,630)
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