

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**DBR FINANCE, INC.,
Petitioner,**

v.

**RUGGED CROSS HUNTING BLINDS, LLC,
Patent Owner**

Case IPR 2024-00291

**Patent 11,399,535
Issue Date: August 2, 2022**

Title: CAMOUFLAGE MATERIAL, FOR A HUNTING BLIND

**MOTION FOR ADMISSION
PRO HAC VICE AND DESIGNATION OF COUNSEL**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner, RUGGED CROSS HUNTING BLINDS, LLC, hereby moves the Board for the entry of an Order permitting the *pro hac vice* admission in the above-styled case of Amber N. Davis, Esq. Further, this Motion and accompanying declaration are submitted in accordance with the “Order – Authorizing Motion for Pro Hac Vice Admission” in *Unified Patents, Inc. v. Parallel Iron, LLC*, Case No. IPR2013-00639, Paper 7 (Oct. 15,

2013) (the “Representative Order”). As required by the Code of Federal Regulations and the Representative Order, the following statement of facts shows that there is good cause for the Board to recognize Ms. Davis *pro hac vice*.

Title 37, section 42.10(c) of the Code of Federal Regulations provides:

The 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 a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

Lead counsel in this proceeding, Robert L. Wolter, is a registered practitioner. Ms. Davis is an experienced patent litigation attorney who has handled numerous patent litigation matters in various courts throughout the country for over seventeen (17) years.

Ms. Davis has an established familiarity with the subject matter at issue in this proceeding and Ms. Davis is also an attorney responsible for the representation of the Patent Owner in other intellectual property litigation and trademark prosecution matters. The Patent Owner has expended significant financial resources in other intellectual property matters with Ms. Davis as counsel and is desirous to continue using Ms. Davis as counsel in this proceeding due to her intimate familiarity with

Patent Owner's business. In addition, the Patent Owner has executed and filed with the Board a Power of Attorney designating Ms. Davis as backup counsel. (See Paper 4 filed herein).

Therefore, Patent Owner, RUGGED CROSS HUNTING BLINDS, LLC, respectfully submits that there is good cause for the Board to recognize Ms. Davis as counsel *pro hac vice* during this proceeding.

DATED this 29th day of December, 2023.

Respectfully submitted,

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Robert L. Wolter
Florida Bar No.: 0906344/Reg. No. 36972
Amber N. Davis, *pro hac vice*
Florida Bar No.: 0026628

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to 37 C.F.R. §§ 42.6(e) and 42.105, a true and correct copy of the foregoing Patent Owner's Motion for *Pro Hac Vice*

Admission of Amber N. Davis and accompanying exhibit was served via electronic mail to: Thomas G. Eschweiler, Esquire (teschweiler@epiplaw.com), Nathanael J. Smith, Esquire (njsmith@epiplaw.com), Ningjiao Zhang, Esquire (nzhang@epiplaw.com) and James Potashnik, Esquire, (jpotashnik@epiplaw.com), Eschweiler & Potashnik LLC, 195 S. Main St., Suite 400, Akron, Ohio 44308, this 29th day of December, 2023.

/s/ Robert L. Wolter
Attorney