

Filed on behalf of: Serendia, LLC

Entered: September 16, 2024

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JEISYS MEDICAL INC.,
Petitioner,

v.

SERENDIA, LLC,
Patent Owner.

Case IPR2024-00386
Patent 9,480,836

**PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF CECILIA PENIZA
UNDER 37 C.F.R. § 42.10(c)**

EXHIBIT LIST

Exhibit	Description
2001	[Proposed] Stipulated Protective Order
2002	Markup Comparison Showing Differences Between the [Proposed] Stipulated Protective Order and the Default Protective Order
2003	Complainant's July 24, 2023 Supplemental Validity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. July 24, 2023) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2004	Expert Report of Jean Woloszko, M.D., Ph.D., dated August 14, 2023 (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2005	Rebuttal Expert Report of Daniel W. van der Weide, dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)
2006	Rebuttal Expert Report of David Goldberg, M.D., J.D., dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)
2007	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 14, 2023 (excerpt)
2008	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 15, 2023 (excerpt)
2009	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken August 31, 2023 (excerpt)

Exhibit	Description
2010	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 1, 2023 (excerpt)
2011	Deposition transcript of David J. Goldberg, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 15, 2023 (excerpt)
2012	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held November 7, 2023 (Jean Woloszko testimony excerpts) (“Woloszko Hr’g Tr.”)
2013	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 12, 2023 (Daniel van der Weide testimony excerpts) (“VDW Hr’g Tr.”)
2014	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 (David Goldberg testimony excerpts) (“Goldberg Hr’g Tr.”)
2015	Complainant’s Rebuttal Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (PROTECTIVE ORDER MATERIAL)
2016	Complainant’s Public Interest Statement & Complaint of Serendia, LLC, Under Section 337 of the Tariff Action of 1930, as Amended, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Mar. 1, 2023)
2017	Parties’ Proposed Procedural Schedule and Notice of USPTO/PTO Proceedings and State and Federal Litigation Pursuant to Order No. 3, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Apr. 24, 2023)

Exhibit	Description
2018	Order No. 6: Adopted Procedural Schedule, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Apr. 27, 2023)
2019	Respondents' Joint Reply Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (excerpts)
2020	Response of Ilooda to the Complaint and Notice of Investigation, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 1, 2023)
2021	Jeisys Medical Inc.'s and Cynosure, LLC's Response to the Complaint and Notice of Investigation, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 1, 2023)
2022	Letter from Merle W. Richman, CKR Law, to Justin S. Cohen, Thompson & Knight LLP, Cutera, dated March 20, 2018
2023	Letter from Keith K. Im, SynKloud Technologies, LLC, to Todd Tillemans, Cynosure, LLC, dated Nov. 29, 2021
2024	Order No. 33: Granting Parties' Joint Motion to Amend the Amended Procedural Schedule [Motion Docket No. 1356-027], <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Oct. 19, 2023)
2025	Exhibit A-02: Invalidity Claim Chart, U.S. Patent No. 9,480,836, Respondents' Invalidity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 24, 2023)
2026	U.S. Patent No. 6,766,202 B2
2027	U.S. Patent No. 9,095,358 B2
2028	U.S. Patent No. 8,012,153 B2
2029	RESERVED

Exhibit	Description
2030	Declaration of Daniel W. van der Weide, dated April 23, 2024 (“VDW Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2031	Declaration of David J. Goldberg, dated April 20, 2024 (“Goldberg Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2032	Jongju Na et al., <i>Electromagnetic Initiation and Propagation of Bipolar Radiofrequency Tissue Reactions via Invasive Non-Insulated Microneedle Electrodes</i> , 5 NATURE SCI. REPS. 16735 (2015)
2033	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 (Dany Bérubé testimony excerpts) (“Bérubé Hr’g. Tr.”)
2034	U.S. Patent Application Publication No. 2011/0288543 A1 (“Cheng”)
2035	Deposition transcript of Jongju Na, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken July 24, 2023 (“Na Dep. Tr.”) (excerpts)
2036	Letter from Long H. Chen-S, FDA, to Lisa Pritchard, Galvanize Therapeutics, dated June 17, 2022
2037	Brochure: Sylfirm X Dual Wave RF Microneedling System (2022) (“Brochure”)
2038	ViOL Patent List (Dec. 1, 2023), https://violmedical.com/about/patent
2039	Sylfirm X Video
2040	Transcript of Exhibit 2039 – Sylfirm X Video
2041	RESERVED

Exhibit	Description
2042	Kevin A. Wilson, <i>Leading Regenerative Therapies Creating a Paradigm Shift in Aesthetic Medicine</i> , Aesthetic Guide 3–9 (Mar./Apr. 2022)
2043	Sylfirm X testimonials
2044	ViOL, Sylfirm X Clinical Paper Summary (updated Jan. 2022)
2045	S.B. Cho et al., In Vivo Skin Reactions from Pulsed-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Invasive Noninsulated Electrodes, SKIN RSCH. TECH. 1–8 (2018) (“Cho Study”)
2046	You Jin Jung et al., Therapeutic Effects of a New Invasive Pulsed-Type Bipolar Radiofrequency for Facial Erythema Associated with Acne Vulgaris and Rosacea, J. COSM. LASER THERAPY 1–5 (2021) (“Jung Study”)
2047	Shaun Wootten et al., An Evaluation of Electrocoagulation and Thermal Diffusion Following Radiofrequency Microneedling Using an In Vivo Porcine Skin Model, J. COSM. DERM. 1–7 (2020) (“Wootten Study”)
2048	Yoram Harth et al., <i>Depressed Acne Scars—Effective, Minimal Downtime Treatment with a Novel Smooth Motion Non-Insulated Microneedle Radiofrequency Technology</i> , 4 J. COSM. DERM. SCIS. APPLS. 212 (2014) (“Harth Study”)
2049	U.S. Patent No. 9,510,899 B2 (“Manstein ’899”)
2050	U.S. Patent No. 6,770,071 B2 (“Woloszko ’071”)
2051	U.S. Patent Application Publication No. 2008/0082090 A1 (“Manstein 090”)
2052	Email exchanges between SynKloud and Jeisys, transmitted December 6, 2021 through January 20, 2022, and Certified English Translations thereof (PROTECTIVE ORDER MATERIAL)

Exhibit	Description
2053	Respondents' Notice of Prior Art, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 24, 2023) ("1356 Investigation NOPA")
2054	Complainant's Initial Validity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. June 16, 2023) (PROTECTIVE ORDER MATERIAL)
2055	<i>Curriculum Vitae</i> of David J. Goldberg, M.D., J.D.
2056	Hee Kyung Kim et al., <i>Immediate and Late Effects of Pulse Widths and Cycles on Bipolar, and Gated Radiofrequency-Induced Reactions in In Vivo Rat Skin</i> , 16 CLINICAL COSM. INVESTIGATIONAL DERM. 721 (2023)
2057	S. Tyler Hollmig & Basil M. Hantash, <i>Radiofrequency in Cosmetic Dermatology, Recent & Future Developments</i> , 24 COSM. DERM. 565 (2011)
2058	U.S. Patent No. 8,142,426 B2 ("Knopp '426")
2059	RESERVED
2060	Dany Berube et al, <i>A Predictive Model of Minimally Invasive Bipolar Fractional Radiofrequency Skin Treatment</i> , 41 LASERS SURG. MED. 473–478 (2009)
2061	Exclusive Distribution and License Agreement between ViOL Co., Ltd. and Serendia LLC, dated February 7, 2018 (PROTECTIVE ORDER MATERIAL)
2062	Presentation: Sylfirm X Clinical Training (2021) (PROTECTIVE ORDER MATERIAL)
2063	Sylfirm Video2
2064	Transcript of Exhibit 2063 - Sylfirm Video2

Exhibit	Description
2065	Presentation: Koh Seikoh, <i>Skin Rejuvenation Treatment of Asian Skin Using Pulse Oscillation Needle RF</i> , 38TH ANN. MTG. JAP. SOC'Y AESTHETIC DERM. (Sept. 13, 2020) (PROTECTIVE ORDER MATERIAL)
2066	Martin Braun, Sylfirm X Revolutionises [sic] the Clinical Applications of RF Microneedling, 12 PRIME INT'L J. AESTHETIC ANTI-AGEING [SIC] MED. 50 (2022)
2067	World-Class Product of Korea 2020, Certificate to ViOL Co., Ltd., dated December 9, 2020 ("Sylfirm X Award")
2068	RESERVED
2069	Baze Mpinja, <i>A New Filler for Laugh Lines & More Procedures That Are Safe for Dark Skin</i> , ALLURE (Mar. 20, 2023), https://www.allure.com/story/inclusive-skin-procedures
2070	<i>Curriculum Vitae</i> of Vincent A. Thomas
2071	Profit & Loss, January–December 2021 (Accrual Basis) (July 6, 2023, 2:31 PM) (PROTECTIVE ORDER MATERIAL)
2072	<i>Curriculum Vitae</i> of Daniel W. van der Weide
2073	Christopher L. Brace et al., <i>Microwave Ablation with a Triaxial Antenna: Results in Ex Vivo Bovine Liver</i> ," 53 IEEE TRANSACTIONS MICROWAVE THEORY TECHS. 215 (2005)
2074	Dieter Haemmerich et al., <i>Finite-Element Analysis of Hepatic Multiple Probe Radio-Frequency Ablation</i> , 49 IEEE TRANSACTIONS BIOMED. ENG'G 836 (2002)
2075	Luca Zilberti, <i>Charge Relaxation in Biological Tissues with Extremely High Permittivity</i> , 7 IEEE MAGNETICS LETTERS 1 (2016)

Exhibit	Description
2076	Int'l Electrotechnical Comm'n Int'l Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2) (6.0 ed. Mar. 2017)
2077	Int'l Electrotechnical Comm'n Int'l Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2:2009 Withdrawn) (5.0 ed. Feb. 2009)
2078	International Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2:2009 Withdrawn), INT'L ELECTROTECHNICAL COMM'N WEBSTORE (5.0 ed.) (Feb. 23, 2009), https://webstore.iec.ch/publication/2624 (last visited Aug. 25, 2023) (Abstract only)
2079	Sylfirm X (product information), ViOL (2022), https://violmedical.com/for_providers/product?idx=10 (last visited Feb. 25, 2023)
2080	RESERVED
2081	RESERVED
2082	RESERVED
2083	ViOL, Sylfirm X User Manual (VO-UM-SFX-03), revised April 20, 2022
2084	Sylfirm X, Device Description (PROTECTIVE ORDER MATERIAL)
2085	RESERVED
2086	Sylfirm X Product Photographs

Exhibit	Description
2087	Presentation: D. van der Weide, RF Microneedle Arrays: Thermal Results, dated July 26, 2023
2088	Photographs: Products at Issue Examinations (June–August 2023)
2089	Cirtec Medical System Drawings, Project: AW000083_A GTW RF PCB, including Certificate of Translation (PROTECTIVE ORDER MATERIAL)
2090	ViOL, Sylfirm X RF Waveform, R&D (May 22, 2023) (PROTECTIVE ORDER MATERIAL)
2091	Product photograph (CX-3378C.1)
2092	Product photograph (CX-3379C.1)
2093	Product photograph (CX-3380C.1)
2094	Product photograph: Bi-Polar Electrodes, Consumable Tip
2095	Jae Min Shin & Jeong Eun Kim, <i>Radiofrequency in Clinical Dermatology</i> , 2 MED. LASERS 49 (2013)
2096	Tae Hwan Ahn & Sung Bun Cho, <i>Invasive Pulse-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Microneedle Electrodes for Nasal Rosacea</i> , 6 MED. LASER 32 (2017)
2097	Sylfirm X Introduction Video 1
2098	Transcript of Exhibit 2097 - Sylfirm X Introduction Video 1
2099	Sylfirm X Introduction Video 2
2100	Transcript of Exhibit 2099 - Sylfirm X Introduction Video 2

Exhibit	Description
2101	Press Release, BENEV Co., Inc., <i>BENEV Launches Sylfirm X Ultimate Edition, a Novel Radiofrequency Micro-needling Device, in the U.S. as the Exclusive Distributor</i> (Apr. 26, 2021, 14:51 ET), https://www.prnewswire.com/news-releases/benev-launches-sylfirm-x-ultimate-edition-a-novel-radiofrequency-micro-needling-device-in-the-us-as-the-exclusive-distributor-301277036.html
2102	Presentation: Jiehoon Kim, ViOL / Sylfirm, <i>Pigmentary and Vascular Treatment with Pulsed RF “Sylfirm,”</i> including Certificate of Translation (PROTECTIVE ORDER MATERIAL)
2103–2138	RESERVED
2139	Declaration of Vincent A. Thomas, dated April 23, 2024 (“Thomas Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2140	Declaration of Charles H. Sanders in Response to Petitioner's Objections to Patent Owner's Evidence [<i>served, not filed</i>]
2141	Declaration of Cecilia Peniza in Support of Patent Owner's Unopposed Motion for <i>Pro Hac Vice</i> Admission Under 37 C.F.R. § 42.10(c)

I. RELIEF REQUESTED

Under 37 C.F.R. § 42.10(c) and the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 4), Patent Owner Serendia, LLC (“Patent Owner”) respectfully requests the *pro hac vice* admission of attorney Cecilia Peniza, Esq. in this proceeding. Patent Owner has conferred with counsel for Jeisys Medical Inc (“Petitioner”), and Petitioner does not oppose this motion.

II. LEGAL STANDARD

Under 37 C.F.R. § 42.10(c):

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

The Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 4) further instructs:

The parties are advised that under 37 C.F.R. § 42.10(c), recognition of counsel *pro hac vice* requires a showing of good cause. The parties are authorized to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c). Such motions shall 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.”

(*Id.* at 2.) The above referenced “Order -- Authorizing Motion for *Pro Hac Vice* Admission” further provides:

A motion for *pro hac vice* admission must:

- 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 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 (3) years; and
- viii. Familiarity with the subject matter at issue in the proceeding.

(IPR2013-00639, Paper No. 7 at 3.) As set forth below, and in the accompanying Declaration of Cecilia Peniza, Esq. (Ex. 2141, “Peniza Decl.”), each of these requirements is satisfied here.

III. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE CECILIA PENIZA *PRO HAC VICE* IN THIS PROCEEDING

Ms. Peniza is a member in good standing of the District of Columbia (Bar No. 994975) and the Virginia State Bar (Bar No. 78917) (Peniza Decl. ¶ 2.) Ms. Peniza has never been suspended or disbarred from practice before any court or administrative body. (*Id.* ¶ 3.) No application of Ms. Peniza for admission to practice before any court or administrative body has ever been denied. (*Id.*) Nor has any court or administrative body imposed sanctions or contempt citations against Ms. Peniza. (*Id.*) Ms. Peniza has read, fully understands, 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 Title 37 of the C.F.R. (*Id.* ¶ 4.) Ms. Peniza acknowledges and agrees that she 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). (*Id.*)

Patent Owner's lead counsel in this proceeding, Charles H. Sanders, is a registered practitioner (Reg. No. 47,053). Moreover, as set forth below (and in her accompanying declaration), Ms. Peniza is both an experienced and technically-trained litigation attorney with an established familiarity with the subject matter at issue in this proceeding.

Ms. Peniza received a B.S. degree in Mechanical Engineering from the University of Florida in 2005 (*Id.* ¶ 5.) Ms. Peniza earned a law degree from Georgetown University in 2009. (*Id.*) Ms. Peniza joined Latham & Watkins LLP ("Latham") as a Partner in 2022. (*Id.*)

Ms. Peniza is currently a member of Latham's intellectual property group, with a focus on patent litigation. (*Id.* ¶ 6.) Ms. Peniza has practiced in Latham's intellectual property group for almost two years. (*Id.*)

Ms. Peniza also has an established familiarity with the subject matter at issue in this proceeding. Ms. Peniza has been actively involved in the related investigation in the International Trade Commission between the Petitioner and Patent Owner, Inv. No. 337-TA-1356, and the following court cases pending in the

District of Delaware: *Serendia, LLC v. Cutera, Inc.*, 1:23-cv-00222; *Serendia, LLC v. Cynosure, LLC*, 1:23-cv-00223; and *Serendia, LLC v. EndyMed Medical, Inc.*, 1:23-cv-00224. (*Id.* ¶ 7.) U.S. Patent No. 9,480,836 (“’836 patent”), which is at issue in this proceeding, is one of the patents asserted by the Patent Owner in the investigation in the International Trade Commission and the district court litigations. (*Id.* ¶ 8.) Ms. Peniza has been actively involved in all aspects of the litigation, including Patent Owner’s factual investigation and development of its claim construction, validity, and infringement positions regarding the claims of the ’836 patent at issue here. (*Id.*)

Ms. Peniza has been actively involved in analyzing and assisting with responding to the Petition for *Inter Partes* Review submitted in this proceeding. (*Id.* ¶ 9.)

She is concurrently applying to appear *pro hac vice* in the following proceedings before the USPTO: Case Nos. IPR2024-00383, IPR2024-00384, and IPR2024-00463. (*Id.* ¶ 10.)

In view of Ms. Peniza’s extensive knowledge of the subject matter at issue in this proceeding, and in view of the interrelatedness of this proceeding and the related investigation in the International Trade Commission and district court litigations, Patent Owner has a substantial need for Ms. Peniza’s *pro hac vice* admission and her involvement in the continued prosecution of this proceeding. In addition,

admission of Ms. Peniza *pro hac vice* will enable Patent Owner to avoid unnecessary expense and duplication of work between this proceeding and the investigation in the International Trade Commission and district court litigations. *See* 77 Fed. Reg. 48,612, 48,661 (Aug. 14, 2012) (Office's comment on final rule discussing concerns about efficiency and costs where an entity has already engaged counsel for parallel district court litigation).

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that Ms. Peniza be admitted *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: September 16, 2024

By: / Charles H. Sanders /

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 16th day of September, 2024, a true and correct copy of the foregoing **Patent Owner's Unopposed Motion For *Pro Hac Vice* Admission Of Cecilia Peniza Under 37 C.F.R. § 42.10(c) and Exhibit 2141** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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IPR2024-00386 (USP 9,480,836)

Patent Owner's Motion for
PHV Admission

Counsel for Patent Owner
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