UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES S.A. AND
DR. REDDY'S LABORATORIES, INC.,
Petitioner,

v.

EYE THERAPIES, LLC,
Patent Owner.

Case IPR2024-00467
Patent 11,833,245 B2

PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF MATTHEW J. LUNEACK

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Eye Therapies, LLC requests that the Patent Trial and Appeal Board (the "Board") admit Matthew J. Luneack *pro hac vice* in this proceeding, IPR2024-00467. Petitioner consents to this motion.

II. STATEMENT OF FACTS

In accordance with 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 the Board may impose. Section 42.10(c) indicates that, "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." The facts here establish good cause for the Board to recognize Mr. Luneack *pro hac vice* in this proceeding.

1. Lead counsel, Bryan C. Diner, is a registered practitioner holding Registration No. 32,409. Back-up counsel, Justin J. Hasford, is a registered practitioner holding Registration No. 62,180. Back-up counsel, Joshua L. Goldberg, is a registered practitioner holding Registration No. 59,369. Back-up counsel, Kassandra M. Officer, is a registered practitioner holding Registration No. 74,083. Back-up counsel, Christina Ji-Hye Yang, is a registered practitioner holding Registration No. 79,103. Back-up counsel,

Ryan V. McDonnell, is a registered practitioner holding Registration No. 76,982. Back-up counsel, M. David Weingarten, is a registered practitioner holding Registration No. 54,533. Back-up counsel, Ryan P. O'Quinn, is a registered practitioner holding Registration No. 67,191.

2. Mr. Luneack is an experienced litigator who has an established familiarity with the subject matter at issue in the proceeding. Accompanying this motion as Exhibit 2270 is the Declaration of Matthew J. Luneack in Support of this Motion for Admission *Pro Hac Vice* ("Luneack Decl."). In his declaration, Mr. Luneack asserts that he is a member in good standing at the Virginia Bar and the District of Columbia Bar. Luneack Decl. ¶ 4. Mr. Luneack also states that he has an established relationship with the subject matter of this proceeding. Luneack Decl. ¶ 12. Specifically, Mr. Luneack demonstrates that he has a detailed working knowledge of the relevant subject matter including the '245 patent and its prosecution history, the prior art references relied upon by the parties, the pleadings and accompanying exhibits. (*Id.*)

3. In his declaration, Mr. Luneack also attests to each of the listed items required by the Order Authorizing Motion for *Pro Hac Vice* Admission 37 C.F.R. § 42.10 in *Unified Patents, Inc. v. Parallel Iron, LLC,* IPR2013-00639, Paper 7 (PTAB Oct. 15, 2013). *See* Luneack Decl. ¶¶ 4-12. Mr. Luneack attests that he has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R. § 42. *Id.* ¶ 9. Mr. Luneack further attests that he agrees to be

subject to the United States Patent and Trademark Office's Rules of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* ¶ 10.

III. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Mr. Luneack *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: January 27, 2025

By: /Bryan C. Diner/

Bryan C. Diner, Lead Counsel
Reg. No. 32,409

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Patent Owner's Motion for Admission *Pro Hac Vice* of Matthew J. Luneack** was served electronically via email on January 27, 2025, in its entirety on the following:

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Dated: January 27, 2025

By: /Geneva Eaddy/
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