

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS INC.,

Petitioner

v.

MONARCH NETWORKING SOLUTIONS LLC,

Patent Owner

Case IPR2024-00485

Patent 8,451,844

**PATENT OWNER'S NOTICE OF INTENT TO DESIGNATE
PROVISIONALLY RECOGNIZED PTAB ATTORNEY
WILLIAM B. COLLIER, JR. AS BACKUP COUNSEL
PURSUANT TO 37 C.F.R. § 42.10(c)**

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Patent Owner's Exhibit List

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EX2001	RFC 2893 – “Transition Mechanisms for IPv6 Hosts and Routers” (Aug. 2000), available at https://datatracker.ietf.org/doc/rfc2893/
EX2002	RFC 1918 – “Address Allocation for Private Internets” (Feb. 1996), available at https://datatracker.ietf.org/doc/rfc1918/
EX2003	Excerpts from Newton’s Telecom Dictionary (11th ed., 1996)
EX2004	Excerpts from IBM Dictionary of Computing (1993)
EX2005	Printout of https://www.ietf.org/staging/
EX2006	Printout of https://www.ietf.org/staging/draft-xli-ivi-00-7430-cancelled.txt
EX2007	Screenshot of Internet Archive history for https://www.ietf.org/ (2008 year selected), available at https://web.archive.org/web/20080801000000*/www.ietf.org
EX2008	Screenshot of Internet Archive history for https://www.ietf.org/staging/ , available at https://web.archive.org/web/202400000000000*/https://www.ietf.org/staging/
EX2009	2008 IEEE Global Telecommunications Conference Proceedings Title Page, available at https://ieeexplore.ieee.org/xpl/conhome/4697774/proceeding
EX2010	Screenshot of Internet Archive history for www3.ietf.org/proceedings/staging , available at https://web.archive.org/web/20080515000000*/www3.ietf.org/proceedings/staging
EX2011	June 13, 2008, Capture of http://www3.ietf.org/proceedings/ , available at https://web.archive.org/web/20080613195553/www3.ietf.org/proceedings/
EX2012	October 4, 2008, Capture of http://www3.ietf.org/proceedings/ , available at https://web.archive.org/web/20081004152450/www3.ietf.org/proceedings/

Exhibit	Description
EX2013	<i>Curriculum Vitae</i> of Dr. William Mangione-Smith
EX2014	Deposition notice of Alexa Morris
EX2015	Declaration of Dr. William Mangione-Smith in Support of Patent Owner's Response
EX2016	Deposition Transcript of Alexa Morris, dated October 22, 2024
EX2017	Deposition Transcript of Ron Bonica, dated October 24, 2024
EX2018	Declaration of William B. Collier, Jr. in Support of Patent Owner's Notice of Intent to Designate Provisionally Recognized Attorney William B. Collier, Jr. as Back-Up Counsel Under 37 C.F.R. § 42.10(c)

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(c)(2), Monarch Networking Solutions LLC (“Monarch” or “Patent Owner”) gives this notice of their intent to designate provisionally recognized attorney William B. Collier, Jr. (“Mr. Collier”) as backup counsel. The facts set forth below and the accompanying Declaration of Mr. Collier, Ex. 2018 (“Collier Decl.”), support his *pro hac vice* admission.

II. STATEMENT OF FACTS SHOWING THERE IS GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THE PROCEEDING

A. Identity of the Registered Practitioner Who Will Serve as Lead Counsel

R. Allan Bullwinkel is a registered practitioner (Reg. No. 77,630) who is currently serving, and will continue to serve, as lead counsel for Patent Owner. *See* Paper 4, at 2.

B. The Most Recent Prior Proceeding in Which the Person Seeking to Appear Was Recognized *Pro Hac Vice* by Order of the Patent Trial and Appeal Board Pursuant to a Motion of the Type Described in 37 C.F.R. §42.10(C)(1)

The most recent prior proceeding in which Mr. Collier sought to appear and was recognized *pro hac vice* by order of the PTAB pursuant to a motion was *Charter Communications Inc. v. Iarnach Technologies, Ltd.*, IPR2024-01287 (PTAB April 4, 2025). *See* Paper 16, ORDER Granting Patent Owner’s Motion for *Pro Hac Vice* Admission of Eric J. Enger and William B. Collier, Jr. 37 C.F.R. § 42.10. Collier Decl. ¶2.

C. Requirements Enumerated in “Order Authorizing Motion for *Pro Hac Vice* Admission” in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (PTAB Oct. 15, 2013) (Representative)

Mr. Collier is a member in good standing of the State Bar of Texas, and admitted to practice law before 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. Collier Decl. ¶3.

Mr. Collier has not been suspended or disbarred from practice before any court or administrative body. *Id.* ¶4.

No court or administrative body has ever denied Mr. Collier’s application for admission to practice. *Id.* ¶4.

No court or administrative body has ever sanctioned or imposed contempt citations on Mr. Collier. *Id.* ¶4.

Mr. Collier 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 CFR part 42. *Id.* ¶5.

Mr. Collier agrees that he is subject to the USPTO Rules of Professional Conduct set forth in 37 CFR § 11.101 *et seq.* and disciplinary jurisdiction under 37 CFR § 11.19(a). *Id.* ¶6.

The proceedings before the Office for which Mr. Collier has applied to appear *pro hac vice* where the Board granted the motion in the last three years are:

- *Charter Communications Inc. v. Iarnach Technologies, Ltd.*, IPR2024-01287, PHV Motion filed August 30, 2024 (Paper 7), granted April 4, 2025 (Paper 16).
- *Juniper Networks, Inc. v. Monarch Networking Solutions LLC*, IPR2024-00175, PHV Motion filed March 7, 2024 (Paper 8), granted March 18, 2024 (Paper 9).
- *Sercomm Corp. v. Atlas Global Technologies, LLC*, IPR2022-01520, PHV Motion filed December 16, 2022 (Paper 12), granted January 6, 2023 (Paper 17).
- *Unified Patents LLC v. Monarch Networking Solutions, LLC*, IPR2020-01708, PHV Motion filed January 27, 2022 (Paper 49), granted February 3, 2022 (Paper 49).

Id. ¶7.

The proceeding before the Office for which Mr. Collier has applied to appear *pro hac vice* where the Board never issued a decision on the motion in the last three years is:

- *Juniper Networks, Inc. v. Monarch Networking Solutions LLC*, IPR2024-00565, PHV Motion filed March 7, 2024 (Paper 8). This matter closed before any action on the application by the Board.

Id. ¶8.

Mr. Collier has legal familiarity with the subject matter at issue in the proceeding. *Id.* ¶¶2, 9–10.

III. CONCLUSION

Upon being deemed admitted *pro hac vice* under 37 C.F.R. § 42.10(c)(2)(iii), Patent Owner will file updated mandatory notices identifying Mr. Collier as back-up counsel of record. And Mr. Collier will keep the Board informed of sanctions, changes to good standing at a bar, or any other event that renders materially inaccurate or incomplete any representation that he made to the Board in connection with this request for *pro hac vice* notice. Collier Decl. ¶12.

Dated: April 25, 2025

/R. Allan Bullwinkel/
R. Allan Bullwinkel
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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 NOTICE OF INTENT TO DESIGNATE PROVISIONALLY RECOGNIZED PTAB ATTORNEY WILLIAM B. COLLIER, JR. AS BACKUP COUNSEL PURSUANT TO 37 C.F.R. § 42.10(c) was served to the following counsel of record for Petitioner as follows:

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Dated: April 25, 2025

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