

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLUIDMASTER, INC.

Petitioner,

v.

DANCO, INC.,

Patent Owner

IPR2024-00634
U.S. Patent No. 9,103,105 B1

**MOTION FOR RANJINI ACHARYA
TO APPEAR *PRO HAC VICE***

Pursuant to 37 C.F.R. § 42.10(c) and the Board’s authorization in the subject proceeding (Paper 5 at 2), Petitioner Fluidmaster, Inc. (“Petitioner”) moves the Board to recognize Ranjini Acharya *pro hac vice* in connection with the Petition for *Inter Partes* Review of U.S. Patent No. 9,139,993 B1 in IPR2024-00633.

Petitioner provides the following information in support of this Motion, as required by the Board’s “Order, Authorizing Motion for Pro Hac Vice Admission, 37 C.F.R. § 42.10” in Case No. IPR2013-00639, Paper 7 (“*Pro Hac* Order”).

Pursuant to the *Pro Hac* Order, Part 2(a), good cause exists for Ranjini Acharya to appear *pro hac vice* in connection with the subject *Inter Partes* Review because: (1) Ms. Acharya is a partner at the law firm Pillsbury Winthrop Shaw Pittman LLP, and is a member of good standing of the Bar of the State of California; (2) Ms. Acharya is an experienced patent litigator with 15 years of litigating patent suits in the US and abroad; (3) Ms. Acharya has over 11 years of experience litigating patent validity issues in federal district courts and around the United States; (4) Ms. Acharya is especially familiar with the subject matter at issue because she represents Petitioner in the related district court proceeding *eDanco, Inc. v. Fluidmaster, Inc.*, Case No. 8:23-cv-01156-AB (DFMx), filed in the United States District Court for the Central District of California, concerning U.S. Patent No. 9,103,105 (the subject of IPR2024-00634), U.S. Patent No. 9,139,993 (the subject of IPR2024-00634), and U.S. Patent No. 10,934,698 (the

subject of IPR2024-00635); (5) Petitioner has a need to have its counsel in the co-pending litigation involved in this proceeding; (6) Carolyn S. Toto, lead counsel for Petitioner with respect to the subject *Inter Partes* Review, and Evan Finkel, back-up counsel for Petitioner with respect to the subject *Inter Partes* Review, are attorneys at Pillsbury Winthrop Shaw Pittman LLP, and are registered practitioners before the United States Patent and Trademark Office (Reg No. 56,817 and 49,059, respectively).

The information required by the *Pro Hac* Order, Part 2 (b)(i)-(viii), can be found in the accompanying Declaration of Ranjini Acharya in support of this Motion.

The undersigned attorney welcomes a telephone call should the Office have any requests or questions.

Date: April 1, 2024

Respectfully submitted,

By: /Carolyn S. Toto/

Carolyn S. Toto

(Reg. No. 56,817)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 1, 2024, a true and correct copy of the foregoing **MOTION FOR RANJINI ACHARYA TO APPEAR *PRO HAC VICE*** is being served via electronic mail on the following attorneys of record:

Lead Counsel	Jason M. Perilla	j.perilla@pkhip.com
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Back Up Counsel	Eric G. Maurer (<i>Pro Hac Vice</i> Application Forthcoming)	e.maurer@pkhip.com

By: /Carolyn S. Toto/
Carolyn S. Toto
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Lead Counsel

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