Filed: June 2, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DR. SQUATCH, LLC
Petitioner

v.

THE PROCTER & GAMBLE COMPANY
Patent Owner

_____

IPR2024-01174
Patent No. 11,497,706

_____

PETITIONER'S MOTION FOR ADMISSION OF MANNY J. CAIXEIRO *PRO HAC VICE*

Pursuant to 37 C.F.R. § 42.10(c), Petitioner respectfully requests the *pro hac vice* admission of Manny J. Caixeiro in these proceedings.

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. 37 C.F.R. § 42.10(c).

Petitioner's lead counsel, Justin J. Oliver, is a registered practitioner. Based on the facts set forth in Mr. Caixeiro's Declaration, good cause exists to admit him *pro hac vice* in these proceedings.

In particular, Mr. Caixeiro is a member in good standing of the bar of the State of California. He has not been suspended, disbarred, sanctioned or denied admission by a court or administrative body. 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 part 42 of the C.F.R., and he understands he 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). Finally, Mr. Caixeiro is familiar with the subject matter at-issue in this proceeding, having participated in drafting the subject Petition and engaged in substantive discussions with Petitioner's lead counsel and technical expert concerning the subject matter of this proceeding.

Dated: June 2, 2025

Respectfully submitted,

/Justin J. Oliver/
Justin J. Oliver
Reg. No. 44,986
VENABLE LLP
600 Massachusetts Ave., NW
Washington, DC 20001
T 202-721-5423
F 202-344-8300

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2025, I caused a true and correct copy of the foregoing to be served via email on counsel for Patent Owner at the following addresses:

David M. Maiorana
Andrea W. Jeffries
Marlee R. Hartenstein
Jesse T. Wynn
dmaiorana@jonesday.com
ajeffries@jonesday.com
mhartenstein@jonesday.com
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IPR2024-01174
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DECLARATION OF MANNY J. CAIXEIRO IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*

I, Manny J. Caixeiro, declare as follows:

1. I am more than twenty-one years of age, am competent to present this declaration, and have personal knowledge of the facts set forth herein.

2. This declaration is given in support of Petitioner's Motion for Admission *Pro Hac Vice* of Manny J. Caixeiro.

3. I am a partner at the law firm of Venable LLP in Los Angeles, CA.

4. I have been practicing law for twenty-one years. My practice during much of that time has focused on intellectual property litigation, and I have been involved in numerous cases involving patent validity and infringement in District Courts across the country. I am, therefore, an experienced litigating attorney.

5. I am a member in good standing of the bar of the State of California. My California Bar membership number is 320473.

6. I also am a member in good standing of the bar of the State of New York. In addition, I am admitted to the bar of the U.S. Court of Appeals for the Second Circuit, the U.S. District Court for the Central District of California, the U.S. District Court for the District of Colorado, the U.S. District Court for the Eastern District of New York, the U.S. District Court for the Northern District of California, and the U.S. District Court for the Southern District of New York. I have never been suspended or disbarred from practice before any court or administrative body.

7. No court or administrative body has ever denied my application for admission to practice before it.

8. No court or administrative body has ever imposed sanctions or contempt citations on me.

9. I have read and will comply with Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in 37 C.F.R. Part 42.

10. I agree to be subject to the United States Patent and Trademark Office's 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).

11. I have experience in *inter partes* reviews. For example, I have assisted with at least the following proceedings: IPR2024-00131, IPR2023-00082, IPR2022-01461, and IPR2022-01460.

12. I am familiar with the subject matter at issue in this proceeding. I have been involved consistently and substantively in this *inter partes* review proceeding since its inception. I participated in the drafting of the Petition filed in this proceeding, and I have reviewed the papers filed in this proceeding.

13. Since June 2024, I have been counsel for the defendant, Dr. Squatch, LLC, in copending litigation in the United States District Court for the Central District of California between Petitioner Dr. Squatch, LLC and the Patent Owner. *The Procter & Gamble Co. v. Dr. Squatch, LLC*, No. 2:24-cv-4711 (C.D. Cal. filed

June 5, 2024). That litigation involves the same ’915 Patent under review in this proceeding.

14. I have engaged in extensive strategic and substantive discussions regarding this proceeding with Justin J. Oliver, who is the lead counsel for Petitioner. I have also engaged in substantive discussions with a technical expert concerning issues relevant to this proceeding.

15. Therefore, I have established familiarity with the subject matter at issue in this proceeding.

16. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: June 2, 2025

Respectfully submitted,

/Manny J. Caixeiro/
Manny J. Caixeiro
Venable LLP
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Tel: 310.229.9900
Fax: 310.229.9901

CERTIFICATE OF SERVICE

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