

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SILENCERCO WEAPONS RESEARCH, LLC,

Petitioner,

v.

HUXWRX SAFETY CO. LLC,

Patent Owner.

Case IPR2024-01214

Patent 8,286,750

**PATENT OWNER HUXWRX SAFETY CO. LLC'S UNOPPOSED MOTION
FOR *PRO HAC VICE* ADMISSION OF CHRISTOPHER G. GRANAGHAN
UNDER 37 C.F.R. § 42.10(c)**

TABLE OF EXHIBITS

Exhibit	Description
2001	Declaration of G. Paul Neitzel, Ph.D. Pursuant to 37 C.F.R. § 1.68
2002	Transcript of the Deposition of John Nixon
2003	Second Declaration of G. Paul Neitzel, Ph.D. Pursuant to 37 C.F.R. § 1.68
2004	Definition of “around” from Merriam-Webster Online Dictionary, available at https://www.merriam-webster.com/dictionary/around , last accessed September 2, 2025
2005	Declaration of Christopher G. Granaghan in Support of Unopposed Motion for <i>Pro Hac Vice</i> Admission

I. RELIEF REQUESTED

In the Notice of Filing Date Accorded to Petition (“Notice”) mailed August 15, 2024, the Board authorized the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c). The Notice requires that such motions be filed in accordance with the “Order – Authorizing Motion for Pro Hac Vice Admission” in Case IPR2013-00639, Paper No. 7 (“Order”).

Patent Owner respectfully requests that the Board recognize Christopher G. Granaghan as counsel *pro hac vice* during this proceeding.

II. NO OPPOSITION TO THIS MOTION

Patent Owner has conferred with Petitioner with regard to this Motion, and Petitioner has confirmed that it will not oppose this Motion.

III. GOVERNING LAWS, RULES, AND PRECEDENT

The Board may recognize counsel *pro hac vice* during a proceeding on a showing of good cause. “[W]here lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigation attorney and has an established legal familiarity with the subject matter at issue in the proceeding.” 37 C.F.R. § 42.10(c).

IV. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Christopher G. Granaghan submitted herewith as Exhibit 2005, Patent Owner submits

that a showing of good cause has been made and respectfully requests the *pro hac vice* admission of Christopher G. Granaghan in this proceeding:

1. Patent Owner's lead counsel, Brent N. Bumgardner, is a registered practitioner (Reg. No. 48,476).

2. Mr. Granaghan is an experienced litigating attorney and has been litigating patent cases for over thirteen years. Ex. 2005, ¶¶ 2-3.

3. Mr. Granaghan is a member in good standing of the Texas State Bar. *Id.*, ¶ 4. Mr. Granaghan is also admitted to practice in all federal district courts in Texas, the United States Court of Appeals for the Federal Circuit, and the United States Court of Appeals for the Fifth Circuit. *Id.*

4. Mr. Granaghan has never been suspended or disbarred from practice before any court or administrative body, nor has he ever been the subject of any ethical grievance procedure or investigation. *Id.*, ¶ 5.

5. No application filed by Mr. Granaghan for admission to practice before any court or administrative body has ever been denied. *Id.*, ¶ 6.

6. No sanctions or contempt citations have been imposed against Mr. Granaghan by any court or administrative body. *Id.*, ¶ 7.

7. Mr. Granaghan has read and agrees to 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.*, ¶ 8.

8. Mr. Granaghan understands that he will be subject to the USPTO 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.*, ¶ 9.

9. Mr. Granaghan has not sought to appear *pro hac vice* in any other proceeding before the Office within the last three years. *Id.*, ¶ 10. Mr. Granaghan has appeared *pro hac vice* in the following proceedings, all of which ended more than three years ago: IPR2018-00653, IPR2018-00655, IPR2019-00194, IPR2019-00635, IPR2019-00707, IPR-2019-00710, IPR2019-00757, IPR2019-00763, and IPR2020-00352. *Id.*

10. Mr. Granaghan has an established legal familiarity with the subject matter at issue in this proceeding. In particular, Mr. Granaghan is familiar with the evidence and arguments related to patentability of the original claims, as well as all issues related to the motion to amend, including procedural requirements for a motion to amend and the substantive arguments related to the proposed amendments. *Id.*, ¶ 11.

V. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. GRANAGHAN IN THIS PROCEEDING.

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 any other conditions as the Board may impose. 37 C.F.R. § 42.10(c).

Patent Owner's lead counsel, Brent N. Bumgardner, is a registered practitioner.

Based on the facts contained herein, as supported by Mr. Granaghan's declaration (Ex. 2005), good cause exists to admit Mr. Granaghan *pro hac vice* as backup counsel in this proceeding.

Patent Owner has a substantial need for Mr. Granaghan's *pro hac vice* admission and his involvement in oral argument and other issues arising from this proceeding.

Admission of Mr. Granaghan will also ease the burden on Patent Owner's lead counsel in this proceeding.

VI. CONCLUSION

For the foregoing reasons as well as the reasons contained in the attached declaration, Patent Owner respectfully requests admission of Christopher G. Granaghan as counsel *pro hac vice* as backup counsel in this proceeding.

Dated: September 23, 2025

/s/ Brent N. Bumgardner
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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2025, a copy of Patent Owner HuxWrx Safety Co. LLC's Unopposed Motion for *Pro Hac Vice* Admission of Christopher G. Granaghan Under 37 C.F.R. § 42.10(c) has been served in its entirety via email on the following:

Email: tgetzoff@hollandhart.com
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Dated: September 23, 2025

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