

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Axle & Manufacturing, Inc.
Petitioner,

v.

Neapco Components, LLC,
Patent Owner

IPR2025-00090
U.S. Patent 11,434,958

**PETITIONER’S UNOPPOSED MOTION FOR ADMISSION
PRO HAC VICE OF JACOB T. MICHALAKES**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Petitioner, American Axle & Manufacturing, Inc. (“American Axle” or “Petitioner”) hereby requests that the Patent Trial and Appeal Board (the “Board”) admit Jacob T. Michalakes *pro hac vice* in this proceeding, IPR2025-0090.

II. GOVERNING LAW, RULES, AND PRECEDENT

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 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.” Accompanying this motion as Exhibit 1041 is the Declaration of Jacob T. Michalakes in support of this Motion for Admission *Pro Hac Vice* (“Michalakes Decl.”).

III. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PROC HAC VICE* DURING PROCEEDING

The facts here establish good cause for the Board to recognize Jacob T. Michalakes *pro hac vice* in this proceeding.

1. Lead counsel, James R. Nuttall, is a registered practitioner (Reg. No. 44,978).
2. Jacob T. Michalakes is an associate at the law firm Steptoe LLP. Michalakes Decl. ¶ 1 (Ex. 1041).
3. Mr. Michalakes is an experienced litigation attorney who has litigated cases related to patents for over 4 years. *Id.* at ¶ 2.
4. Mr. Michalakes has never been suspended or disbarred from practice before any court or administrative body. *Id.* at ¶ 5.
5. No application filed by Mr. Michalakes for admission to practice before any court or administrative body has ever been denied. *Id.* at ¶ 6.
6. No sanctions or contempt citations have been imposed against Mr. Michalakes by any court or administrative body. *Id.* at ¶ 7.
7. Mr. Michalakes is a member of good standing of the Illinois Bar and is admitted to practice before the United States District Court for the Northern District of Illinois, and the United States District Court for the Eastern District of Michigan. *Id.* at ¶ 3.
8. Mr. Michalakes also demonstrates that he has a detailed working knowledge of the relevant subject matter through his familiarity with the patent-at-issue, the cited prior art, the Petition for *Inter Partes*

Review of the ‘958 patent, and other aspects of the record in this proceeding. *Id.* at ¶ 9.

9. Mr. Michalakes has acquired substantial understanding of the underlying legal and technological issues in this proceeding. *Id.* at ¶ 9.
10. Mr. Michalakes has read and agrees to comply with the Patent Trial Practice Guide and the Board’s Rules of Practice for Trials as set forth in 37 C.F.R. § 42. *Id.* at ¶ 10.
11. Mr. Michalakes understands that 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). *Id.* at ¶ 11.
12. Counsel for Patent Owner was contacted and does not oppose this motion.

IV. GOOD CAUSE EXISTS FOR *PRO HAC VICE* ADMISSION OF JACOB T. MICHALAKES

The facts outlined above, supported by the Declaration of Jacob T. Michalakes (Ex. 1041), establish there is good cause to admit Mr. Michalakes *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Petitioner’s lead counsel, James R. Nuttall, is a registered practitioner in good standing before the Board. Mr. Michalakes is an experienced litigating attorney in good standing in the Bar of Illinois, and is admitted to practice in the United States District Court for the Northern District of Illinois, and the United States District Court for the Eastern District of Michigan. Mr.

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Michalakes has carefully reviewed the ‘958 patent-at-issue, the cited prior art, the
Petition for *Inter Partes* Review of the ‘958 patent, and other aspects of the record
in this proceeding. Based on his experience and knowledge, there is good cause to
admit Mr. Michalakes *pro hac vice* in this proceeding.

V. CONCLUSION

In light of the foregoing, Patent Owner respectfully requests that the Board
admit Jacob T. Michalakes *pro hac vice* in this proceeding.

Date: June 26, 2025

Respectfully submitted,
/ James R. Nuttall, Reg. No. 44,978/
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***Counsel for Petitioner American Axle &
Manufacturing, Inc.***

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), the undersigned hereby certifies that a copy of the foregoing PETITIONER'S UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF JACOB T. MICHALAKES, and Exhibit 1041, were served on June 26, 2025 by filing this document through the P-TACTS platform as well as by delivering a copy via the delivery method indicated to the attorneys of record for the Patent Owner as follows:

Via Email:

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Date: June 26, 2025

By: / James R. Nuttall, Reg. No. 44,978/

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