

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

GREEN REVOLUTION COOLING, INC.,
Petitioner

v.

MIDAS GREEN TECHNOLOGIES, LLC,
Patent Owner.

Patent No. 10,405,457 to Boyd, et al.

IPR Case No.: IPR2025-00196

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC*
VICE ADMISSION OF STEPHEN M. ULLMER UNDER 37
C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), and pursuant to the authorization provided by the United States Patent and Trademark Office's Patent Trial and Appeal Board ("Board") in Paper Number 5, dated December 19, 2024 ("the Notice"), Petitioner Green Revolution Cooling, Inc. ("Petitioner") submits this unopposed motion for Stephen M. Ullmer to appear *pro hac vice*. Petitioner respectfully requests the Board to recognize Mr. Ullmer as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so as shown below.

I. TIME FOR FILING

Pursuant to the authorization provided in the Notice, this motion for *pro hac vice* admission is being filed no sooner than twenty-one days after service of the Petition.

II. STATEMENT OF FACTS

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Ullmer *pro hac vice*.

Petitioner's lead counsel for this proceeding, Heath J. Briggs, is a registered practitioner (Reg. No. 54,919).

Mr. Ullmer is an experienced litigation attorney with over thirteen (13) years of litigation experience. Ex. 1023 at ¶ 8. He has been involved in numerous patent infringement cases in federal district courts across the country. *Id.* He has experience in various aspects of patent infringement matters, including all aspects

of litigation leading up to and including jury trials and bench trials. *Id.* He is counsel for Petitioner in *Midas Green Technologies, LLC v. Green Revolution Cooling, Inc.*, 6:24-cv-00166-ADA (W.D. Tex), filed on March 29, 2024, where the '457 patent is currently being asserted. Ex. 1023 at ¶ 8.

Mr. Ullmer is a member in good standing in the bars of California, Colorado, and Oregon, the U.S. Court of Appeals for the Federal Circuit, and several U.S. District Courts. Ex. 1023 at ¶ 1.

Mr. Ullmer has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. Ex. 1023 at ¶¶ 2-4.

Mr. Ullmer has obtained substantial familiarity with the involved patent, the prior art, and the various issues raised in this proceeding. Ex. 1023 at ¶ 8-9. Moreover, Mr. Ullmer has reviewed the involved patent, the Petition, the prior art, and all other cited materials. *Id.* at ¶ 9. Given his extensive patent litigation experience, Mr. Ullmer has established familiarity with the subject matter at issue in this proceeding. *Id.*

Mr. Ullmer 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 Title 37 of the Code of Federal Regulations, and he agrees to be subject to the USPTO Rules of

Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.* at ¶ 5-6.

In the last three years, Mr. Ullmer has appeared *pro hac vice* before the Board in *Satco Products, Inc. v. The Regents of the University of California*, No. IPR2021-00662; *Echelon Fitness Multimedia, LLC v. Peloton Interactive, Inc.*, No. IPR2021-00848; *Hewlett Packard Enterprise Co. v. Intellectual Ventures II LLC*, No. IPR2021-01376, 2021-01377, 2021-01378, 2022-0096, and 2022-00211; *Metromont Corp. v. Reigstad & Assocs., Inc.*, No. IPR2021-00467; *Sunspec Alliance v. Tigo Energy, Inc.*, Nos. IPR2021-01286 and 01287; and *Ebates Performance Marketing, Inc. DBA Rakuten Rewards v. International Business Machines Corporation*, Nos. IPR2022-00133, IPR2022-00438, and IPR2022-00646; *Life Spine Inc. v. Globus Medical, Inc.*, Nos. IPR2022-01600 and IPR2022-01602; *SMA Solar Technology America, LLC v. TIGO Energy, Inc.*, No. IPR2023-00879. He has not appeared *pro hac vice* in any other proceedings before the Office in the last three (3) years. Ex. 1023 at ¶ 7.

Given Mr. Ullmer's familiarity with the subject matter at issue in this proceeding, Petitioner respectfully submits that it has shown good cause for the Board to recognize Mr. Ullmer as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion is accompanied by the Declaration of Mr. Ullmer.

Respectfully submitted,
GREENBERG TRAURIG, LLP

Date: June 30, 2025

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CERTIFICATE OF SERVICE

In accordance with § 42.6(e)(1), the undersigned certifies that on the 30th day of June 2025, this paper (PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF STEPHEN M. ULLMER UNDER 37 C.F.R. § 42.10(c)) was served, via electronic mail, upon counsel of record for Patent Owner.

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Respectfully submitted,
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Date: June 30, 2025

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