UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Padagis US LLC,
Petitioner

v.

Neurelis, Inc.,
Patent Owner

IPR2025-00465
Patent No. 11,241,414

UNOPPOSED MOTION FOR HANNAH HURLEY TO APPEAR *PRO HAC VICE* ON BEHALF OF PATENT OWNER NEURELIS, INC.

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Pursuant to the Board's March 17, 2025 Notice of Filing Date Accorded (Paper 8) and 37 C.F.R. §§ 42.10(c) and 42.22, Patent Owner, Neurelis, Inc. ("Neurelis") hereby moves for an Order allowing Hannah Hurley to appear *pro hac vice* on behalf of Neurelis in the above-captioned case.[1] Neurelis has conferred with counsel for Petitioner Padagis US LLC ("Padagis"), and Padagis's counsel indicated that Padagis does not intend to oppose Neurelis's motion to allow Ms. Hurley to appear *pro hac vice* in this matter.

II. LIST OF EXHIBITS RELIED UPON FOR THIS MOTION

Neurelis Exhibit 2501 – Declaration of Hannah Hurley in Support of Motion to Appear *Pro Hac Vice* on Behalf of Patent Owner Neurelis, Inc.

III. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth below in the Statement of Material Facts, Neurelis has made all of the showings required under 37 C.F.R. § 42.10(c) for recognizing Ms. Hurley *pro hac vice*. In particular, Ms. Hurley is a patent litigation attorney with experience in numerous patent litigation cases in various United States District Courts, including technically and legally complex matters such as will be present in this proceeding.

[1] Patent Owner is filing identical motions in each of IPR2025-00464, IPR2025-00465, and IPR2025-00466.

Accordingly, allowing Ms. Hurley to appear *pro hac vice* on behalf of Neurelis is appropriate in this proceeding.

IV. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c) provides that "[t]he 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. For example, where the 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 showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding."

2. Lead counsel for Neurelis in this *inter partes* review proceeding is Michael Sitzman. Mr. Sitzman is registered to practice before the United States Patent and Trademark Office and holds Registration No. 42,150.

3. As set forth in Neurelis Exhibit 2501 (the "Hurley Declaration"), Ms. Hurley is a patent litigation attorney and has an established familiarity with the subject matter at issue in this proceeding. Hurley Decl. ¶¶ 2-4. In particular, Ms. Hurley has 2 years of experience as a patent litigator and has worked in numerous patent litigation cases in various proceedings in United States District Courts. *Id.* ¶ 2.

4. Further, Ms. Hurley holds a degree in biology from University of California, Los Angeles and served as a judicial extern to the Honorable Amy Totenberg of the United States District Court for the Northern District of Georgia. *Id.* ¶ 3. Moreover, Ms. Hurley is experienced with technically and legally complex matters in the field of patent litigation. *Id.*

5. With regard to U.S. Patent Nos. 8,895,546 ("the '546 patent"), 11,241,414 ("the '414 patent"), and 11,793,786 ("the '786 patent"), the patents at issue in this proceeding and the related proceedings, Ms. Hurley is familiar with the patents, the legal subject matter, technical subject matter, and cited art discussed in the petitions for *inter partes* review. *Id.* ¶ 4. In view of her legal experience, technical background, and familiarity with the issues in the present matter, Patent Owner Neurelis has requested her services in the present matter. Denial of her appearance in this case would create an undue burden on Patent Owner. *Id.*

6. Ms. Hurley 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. *Id.* ¶ 9. Ms. Hurley also agrees to be subject to the United States Patent and Trademark Office 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.* ¶ 10.

V. CONCLUSION

In view of the foregoing, and having satisfied the requirements of 37 C.F.R. § 42.10(c), Neurelis hereby moves for an Order allowing Hannah Hurley of McDermott Will & Schulte LLP, to appear pro hac vice on behalf of Neurelis in the above-captioned case.

Date: May 28, 2026

Respectfully submitted,

/Michael Sitzman/

Michael Sitzman
(Reg. No. 42,150)
MCDERMOTT WILL & SCHULTE LLP
415 Mission St Suite 5600
San Francisco, CA 94105-2616
Tel: +1 628 2183917
msitzman@mcdermottlaw.com

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document and Exhibit 2501 were served on counsel of record for the Petitioner by filing this document through PTAB P-TACTS and by sending the same via electronic mail to the following addresses:

James P. Murphy
Reg. No. 55,474
Polsinelli PC
1000 Louisiana Street
Suite 6400
Houston, Texas 77002
Tel: (713) 374-1600
jpmurphy@polsinelli.com

Corey Casey
Reg. No. 66,950
Polsinelli PC
900 West 48th Place
Suite 900
Kansas City, Missouri 64112
Tel: (816) 572-4439
ccasey@polsinelli.com

Mark Deming
Reg. No. 69,263
Polsinelli PC
150 N. Riverside Plaza Suite 300
Chicago, IL 60606
mdeming@polsinelli.com

Chad A. Landon
Provisionally Recognized Pro Hac Vice
Polsinelli PC
1401 I St. NW Suite 800
Washington, DC 20005
clandmon@polsinelli.com

Dated: May 28, 2026

/Michael Sitzman/
Michael Sitzman (Reg. No. 42,150)
MCDERMOTT WILL & EMERY LLP
415 Mission St Suite 5600
San Francisco, CA 94105-2616
Tel: +1 628 2183917
msitzman@mcdermottlaw.com

Lead Counsel for Patent Owner