**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ANTHONY INC.,
Petitioner

v.

CONTROLTEC, LLC,
Patent Owner

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IPR2025-00559
U.S. Patent 7,207,181

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF CHARLES M. JONES II**

Patent Owner ControlTec, LLC ("ControlTec") requests that the Board admit Charles M. Jones II *pro hac vice* in this proceeding.

## I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner ControlTec, LLC ("Patent Owner") respectfully requests that the Board admit Charles M. Jones II *pro hac vice* in this proceeding as back-up counsel. Counsel for Petitioner does not oppose this Motion.

## II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c), 37 C.F.R., provides that:

> 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. 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.

The Board has further required that a motion for *pro hac vice* admission be filed in accordance with the "Order - Authorizing Motion for *Pro Hac Vice* Admission" entered in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) ("Unified Patents Order").

The *Unified Patents* Order requires that such motions (1) "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel

*pro hac vice* during the proceeding[,]" and (2) "[b]e accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:"

i. Membership in good standing of the Bar of at least one State or the District of Columbia;

ii. No suspensions or disbarments from practice before any court or administrative body;

iii. No application for admission to practice before any court or administrative body ever denied;

iv. No sanctions or contempt citations imposed by any court or administrative body;

v. The individual seeking to appear 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 37 C.F.R.;

vi. The individual will be subject to the U.S.P.T.O. 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);

vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and

viii. Familiarity with the subject matter at issue in the proceeding.

## III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Charles M. Jones II, submitted herewith as Ex.2013, Patent Owner requests the *pro hac vice* admission of Charles M. Jones II in this proceeding:

1. Patent Owner's lead counsel, Robert P. Ziemian (the undersigned) is a registered practitioner (Reg. No. 57,931).

2. Mr. Jones is a partner at the law firm of Haynes and Boone LLP. Ex.2013 ¶ 8.

3. Mr. Jones is an experienced litigator, and a significant portion of his practice has consisted of patent litigation and other patent-related matters. *Id.*¶ 9.

4. Mr. Jones has an established familiarity with the subject matter at issue in this proceeding, and has reviewed the patent at issue, as well as the petition. *Id.* ¶ 11.

5. Mr. Jones is a member in good standing of the state bar of Texas. *Id.* ¶¶ 1-2.

6. Mr. Jones has never been suspended or disbarred, had an application for admission denied, or had any sanctions or contempt citations imposed upon him. *Id.* ¶¶ 3-5.

7. Mr. Jones has read and will comply with the Trial Practice Guide and the Board's Rules of Practice for Trials; and agrees to be subject to the USPTO Rules for Professional Conduct and disciplinary jurisdiction. *Id.* ¶¶ 6-7.

8. Mr. Jones has not applied for *pro hac vice* admission before the USPTO in the past. *Id*. ¶ 10.

## IV. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF CHARLES M. JONES II

The Board may recognize counsel *pro hac vice* 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).

The facts outlined above in the Statement of Facts, and contained in the Declaration of Charles M. Jones II (Ex.2013), establish that there is good cause to admit Mr. Jones *pro hac vice* in this proceeding. Patent Owner's lead counsel is a registered practitioner. Mr. Jones has extensive experience in patent litigation and other patent proceedings. He also has an established familiarity with the subject matter at issue, including the patent, petition, and references.

## V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit Mr. Jones *pro hac vice* in this proceeding.

Dated: November 7, 2025

Respectfully submitted,

HAYNES AND BOONE LLP
2801 N. Harwood St., Suite 2300
Dallas, Texas 75201
Customer No. 27683

Robert P. Ziemian
Lead Counsel for Patent Owner
Registration No. 57,931

**PATENT OWNER'S UPDATED EXHIBIT LIST**

November 7, 2025

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| Ex.2001 | Anthony corporate history webpage, https://www.anthonyintl.com/Aboutus/History.aspx |
| Ex.2002 | U.S. Patent No. 4,261,179 to Dageford |
| Ex.2003 | U.S. Patent No. 5,778,147 to Kim |
| Ex.2004 | Declaration of John "Weeb" Bunch under 37 C.F.R. § 1.68 |
| Ex.2005 | Photographs of ControlTec LLC's AS-20 Anti-Sweat Controller case |
| Ex.2006 | Maintenance fee report for U.S. 7,207,181 |
| Ex.2007 | WIPO(PCT) Application No. WO2006093751A2 to Murray |
| Ex.2008 | International Search Report for Application No. WO2006093751A2 |
| Ex.2009 | Written Opinion of the International Searching Authority for Application No. WO2006093751A2 |
| Ex.2010 | Information Disclosure Statement filed in U.S. Patent Application No. 12/337,981 on March 17, 2009. |
| Ex.2011 | Patent Assignment, Reel 023084, Frame 0117 (assigning U.S. Patent Application No. 12/337,981 to Anthony International). |
| Ex.2012 | Patent Assignment, Reel 027144, Frame 0103 (confirming Anthony International as a DBA of Anthony, Inc. and that U.S. Patent Application No. 12/337,981 was assigned to Anthony Inc.). |
| **Ex.2013 (NEW)** | **Declaration of Charles M. Jones II in Support of Patent Owner's Motion for *Pro Hac Vice* Admission of Charles M. Jones II** |

## CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6, that service was made on the Petitioner as detailed below.

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| *Date of service* | November 7, 2025 |
| *Manner of service* | Electronic Email: IPR43789-0259IP1@fr.com; PTABInbound@fr.com |
| *Documents served* | **Patent Owner's Motion for *Pro Hac Vice* Admission of Charles M. Jones II; Updated Exhibit List and Exhibit Ex.2013** |
| *Persons served* | Kenneth W. Darby Jr.<br>Kenneth Hoover<br>Christopher Dillon (Pending *Pro Hac Vice*)<br>Fish & Richardson P.C.<br>60 South Sixth Street, Suite 3200<br>Minneapolis, MN 55402 |

Robert P. Ziemian
Lead Counsel for Patent Owner
Registration No. 57,931