

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

ALBANY INTERNATIONAL CORP.,

Petitioner

v.

VOITH PATENT GMBH,

Patent Owner.

U.S. PATENT NO. 11,261,566
Case No. IPR2025-01116

**PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF JOHN PADRO
UNDER 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. §42.10(c) Patent Owner Voith Patent GmbH (“Voith”) respectfully request that the Board allow John Padro to appear *pro hac vice* on its behalf in this proceeding, IPR2025-01116 regarding U.S. Patent No. 11,261,566 (“the ’566 patent”).

I. THE REQUEST IS TIMELY

Pursuant to the Board’s “Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response,” dated July 1, 2025 (Paper No. 5), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. §42.10(c), Patent Owner Voith respectfully requests that the Board allow John Padro to appear *pro hac vice* on their behalf in this proceeding. Counsel for Petitioner does not oppose the relief requested in this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37 C.F.R. § 42.10(c), the Patent Owner has demonstrated good cause to admit Mr. Padro *pro hac vice* in this proceeding. In particular, Patent Owner’s lead counsel is a registered practitioner, and Mr. Padro is an experienced litigating attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty one days after service of the petition and includes a Statement of Material Facts showing good cause for the Board to recognize Mr. Padro *pro hac vice*. The motion is also filed

concurrently with Exhibit 2022, the Declaration of John Padro in Support of Patent Owner's Motion for *Pro Hac Vice* Admission of John Padro under 37 C.F.R. § 42.10(c) ("Padro Decl."). These filings satisfy the requirements set forth in the "Order Authorizing Motion for *Pro Hac Vice* Admission" in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 at 3 (P.T.A.B. Oct. 15, 2013).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c)(1) 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. Theodoros Konstantakopoulos, lead counsel for Patent Owner Voith in this proceeding, is a registered practitioner holding Registration No. 74,155.

3. As set forth in the Padro Declaration, Mr. Padro is an experienced litigating attorney. Specifically, Mr. Padro has been litigating patent cases for over 16 years. Mr. Padro has been practicing law since 2010 and has extensive experience litigating patent infringement cases in district courts across the United

States. Mr. Padro’s experience in patent litigation matters includes examining non-expert and expert witnesses arguing Markman hearings and patent dispositive motion proceedings, and representing clients in other patent-related hearings and pleadings concerning, *inter alia*, patent validity and infringement issues. (Padro Decl. ¶¶ 2–3).

4. Mr. Padro’s experience also includes practice before the Patent Trial and Appeal Board including the representation of a client in multiple IPR proceedings. (Padro Decl. ¶ 3).

5. Mr. Padro also has an established familiarity with the precise subject matter at issue in this proceeding. In the course of this representation, he has developed a strong familiarity with the ‘566 patent, its prosecution history, the general subject matter to which the ‘566 patent is directed, and the prior art references relied upon by the Petitioners. (Padro Decl., ¶ 6.) Additionally, Mr. Padro has thoroughly reviewed the Petition and accompanying Exhibits submitted in this proceeding. *Id.*

6. Mr. Padro has attested to each of the requirements set forth in paragraph 2(b)(i)-(viii) of the “Order Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639, Paper 7, at 3. (Padro Decl. ¶¶ 7-11).

7. The Commissioner is hereby authorized to charge all fees due in connection with this *pro hac vice* application to Attorney Deposit Account 506989.

IV. CONCLUSION

In view of the foregoing, Patent Owner Voith respectfully submits that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and request an Order permitting John Padro to appear *pro hac vice* on their behalf in this proceeding.

Date: May 21, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing **Patent Owner's Motion for Pro Hac Vice Admission of John Padro Under 37 C.F.R. § 42.10(c) and Exhibit 2022 Declaration of John Padro in Support of Motion for Pro Hac Vice Admission Under 37 CFR § 42.10(c)** has been served on the Petitioner via email as indicated below:

Grace Kim, Reg. No. 71,977
Michael Kane, Reg. No. 39,722
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Respectfully submitted,

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