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Subject: IPR2025-01194 and IPR2025-01195
Date: Monday, September 15, 2025 1:19:08 PM
Attachments: [image001.png](#)

Counsel,

From the Board –

Patent Owner’s Notices of Intent to designate Katherine A. Helm as a provisionally recognized PTAB attorney (Notices) as back-up counsel in IPR2025-01194 and IPR2025-01195 pursuant to 37 C.F.R. § 42.10(c)(2) are acknowledged. Although Ms. Helm is included in earlier-filed mandatory notices, 37 CFR §42.10(c)(2)(iii) provides that *updated* mandatory notices need to be filed after the expiration of the applicable time period (5 or 10 business days) set forth in 37 C.F.R. § 42.10(c)(2)(iii), in order for the attorney to be deemed admitted.

In other words, *pro hac vice* recognition will not be effective until the party files an updated mandatory notice after the expiration of the applicable time period (5 or 10 business days) set forth in 37 C.F.R. § 42.10(c)(2)(iii). A previously filed mandatory notice that includes the *pro hac vice* attorney does not meet 37 C.F.R. § 42.10(c)(2)(iii). Thus, after the objection expiration date (9/15/25), Patent Owner may file updated mandatory notices in each of IPR2025-01194 and IPR2025-01195 referencing Ms. Helm under 37 C.F.R. §42.10(c)(2)(iii).

Regards,

Andrew Kellogg,
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