UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CYBERSECURE IPS, LLC,

Petitioner,

v.

NETWORK INTEGRITY SYSTEMS, INC.,

Patent Owner,

Patent No. 7,706,641
Issue Date: April 27, 2010
Title: Monitoring individual fibers of an optical cable for intrusion

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Inter Partes Review No.: IPR2025-01441

PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF JACK T. CARROLL UNDER 37 C.F.R. §42.10(c)

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. §42.10(c), Petitioner Network Integrity Systems, Inc. respectfully moves the Board to recognize counsel Jack T. Carroll *pro hac vice* for purposes of the above-captioned *inter partes* review.

II. AUTHORIZATION FOR THIS MOTION

This motion was authorized pursuant to the Board's notice according a filing date to the petition. Paper 3.

III. GOOD CAUSE EXISTS TO GRANT THIS MOTION

Good cause exists to recognize Mr. Carroll *pro hac vice*. The undersigned lead counsel, Kimberly K. Dodd, is a registered practitioner. As set forth in the accompanying Declaration in Support of Motion for *Pro Hac Vice* Admission of Jack T. Carroll, Exhibit 1027, Mr. Carroll is an experienced litigation attorney with an established familiarity with the subject matter at issue in this *inter partes* review. *Id.*, ¶¶11-12. Mr. Carroll is admitted to practice in Wisconsin. *Id.*, ¶3. Mr. Carroll received his J.D. from the University of Wisconsin Law School and graduated with a B.S. in Chemistry from Marquette University. *Id.*, ¶10. In his declaration, Mr. Carroll also attests to each of the listed items required by 37 C.F.R. §42.10(c). *See id.*, ¶¶3-13.

Mr. Carroll has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials (*id*., ¶7), and further

understands that he will be subject to the USPTO Code of Professional Responsibility (*id.*, ¶8).

Patent Owner was contacted about this motion and has indicated that it does not oppose the motion.

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

Respectfully submitted,

Dated: September 12, 2025

By: */Kimberly K. Dodd*

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