

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOPSOE INC.,

Petitioner,

v.

CASALE SA,

Patent Owner.

Patent No. 11,286,168

Issued: March 29, 2022

Filed: August 13, 2019

Inventors: Francesco Baratto et al.

Title: PROCESS FOR THE SYNTHESIS OF AMMONIA WITH LOW
EMISSIONS OF CO₂ IN ATMOSPHERE

Inter Partes Review No. IPR2025-01454

**CASALE SA'S MOTION FOR *PRO HAC VICE* ADMISSION OF PAYTON
GEORGE UNDER 37 C.F.R. § 42.10(c)**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner Casale SA, by and through its attorneys, respectfully requests that the Board admit Payton George *pro hac vice* in this proceeding.

II. GOVERNING LAW, RULES, AND PRECEDENT

Section 42.10(c) states as follows:

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.

Further, the Board requires that a motion for *pro hac vice* admission be filed in accordance with the “NOTICE OF FILING DATE ACCORDED – 37 C.F.R. § 42.10” in *Topsoe Inc. v. Casale SA*, Case No. IPR2025-01454 (“Notice of Filing Date”). The Notice of Filing Date states that the motion must “[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding,” and “[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 the C.F.R.;
- vi. The individual will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§10.20 *et seq.*¹ 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.¹

¹ The USPTO Code of Professional Responsibility in 37 C.F.R. § 10.20 *et seq.* was replaced by the USPTO Rules of Professional Conduct in 37 C.F.R. § 11.101 *et seq.*, effective May 3, 2013.

III. STATEMENT OF FACTS

Based on the following statement of facts, and supported by the Declaration of Payton George submitted herewith, Casale SA submits that a showing of good cause has been made and respectfully requests the *pro hac vice* admission of Payton George in this proceeding:

1. Casale SA's lead counsel, Case Collard is a registered practitioner (Reg. No. 72,901).
2. Ms. George is an Associate at the law firm of Dorsey & Whitney, LLP ("Dorsey") and is counsel of record for Patent Owner, Casale S.A., in the related district court litigation, *Topsoe, Inc. v. Casale US, Inc. et al.*, No. 3:24-cv-00033 (S.D. Tex.) (the "S.D. Tex. Litigation"). Ms. George joined Dorsey as an Associate in October 2018. (Declaration of Payton George in Support of Casale SA's Motion for *pro hac vice* Admission of Payton George under 37 C.F.R. § 42.10(c).)
3. Ms. George is a litigation attorney with specific experience in patent law and patent law litigation. Ms. George has represented clients in numerous patent infringement actions across the country. (*Id.*)
4. Ms. George is a member in good standing of the state of Minnesota and in the District of Columbia. (*Id.*)

5. Ms. George has never been suspended or disbarred from practice before any court or administrative body. (*Id.*)
6. No application filed by Ms. George for admission to practice before any court or administrative body has ever been denied. (*Id.*)
7. No sanctions or contempt citations have been imposed against Ms. George by any court or administrative body. (*Id.*)
8. Ms. George has read and agrees to comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R. (*Id.*)
9. Ms. George understands that she will be subject to the USPTO Rules of Professional Conduct 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. §11.19(a). (*Id.*)
10. Ms. George has applied to appear pro hac vice in one proceeding before the United States Patent and Trademark Office in the last three (3) years. That proceeding is *Shenzhen Qianfenyi Intelligent Technology Co., Ltd. v. Wacom Co., Ltd.*, PTAB-IPR2025-01533. Her pro hac vice application was filed on October 10, 2025, and was still pending when institution was discretionarily denied on January 16, 2026. *Id.*; PTAB-IPR2025-01533, Paper 14.

11. Ms. George has an established familiarity with the subject matter at issue in this, and the other related proceeding noted below. Ms. George has familiarity with the subject matter at issue in this proceeding and in the related S.D. Tex. Litigation. Since that time, she has closely studied the asserted patents and participated in discovery related to the same. Ms. George has acquired substantial understanding of the underlying issues at stake in this matter.
12. There would be no need to update the Power of Attorney or Mandatory Notices upon granting of this motion, because Ms. George was listed in those previously-filed documents with the expectation that this motion would be brought.

IV. GOOD CAUSE EXISTS FOR PRO HAC VICE ADMISSION OF PAYTON GEORGE

The facts outlined above in the Statement of Facts, and contained in the Declaration of Payton George, establish that there is good cause to admit Ms. George *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Casale SA's lead counsel is a registered practitioner. Ms. George has specific experience in litigating patent matters and has an established familiarity with the subject matter at issue in this, and the other related proceeding noted in Section III., Paragraph 11, *supra*.

V. CONCLUSION

In light of the foregoing, Casale SA respectfully requests that the Board admit Payton George *pro hac vice* in this proceeding.

Dated: March 26, 2026

Respectfully submitted,

/Case Collard/

Case Collard

Registration No. 72,901

DORSEY & WHITNEY LLP

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Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on March 26, 2026, a complete and entire copy of this Motion for Pro Hac Vice Admission was served on the Petitioner via electronic mail at the following addresses:

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Dated: March 26, 2026

Respectfully submitted,

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