

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.

Petitioner

v.

BULLETPROOF PROPERTY MANAGEMENT, LLC.

Patent Owner.

IPR2026-00227
Patent 11,932,230

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

I. RELIEF REQUESTED

Under 37 C.F.R. § 42.10(c) and the Notice of Filing Date Accorded to Petition (“Notice,” Paper No. 3), Patent Owner Bulletproof Property Management, LLC respectfully requests the *pro hac vice* admission of attorney Robert J. Rando, Esq. in this proceeding. Moreover, should this motion be granted, Patent Owner then intends to file “notice(s) of intent to designate a provisionally recognized PTAB attorney as back-up counsel pursuant to 37 C.F.R. § 42.10(c)(2)” in the six other related¹ IPR proceedings. Notice, Paper 3 at 3. Patent Owner has conferred with counsel for Petitioner, and Petitioner does not oppose this motion.

II. LEGAL STANDARD

37 C.F.R. § 42.10(c)(1) states:

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 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 legal familiarity with the subject matter at issue in the proceeding.

The Notice (Paper 3) states:

Once a party has designated a registered practitioner as lead counsel pursuant to 37 C.F.R. § 42.10(a) and filed a power of attorney for lead counsel if required by 37 C.F.R. § 42.10(b), that party is also authorized to file one or

¹ The full list of proceedings includes IPR2026-00227 (U.S. Pat. No. 11,932,230), IPR2026-00219 (U.S. Pat. No. 12,221,104), IPR2026-00204 (U.S. Pat. No. 12,227,184), IPR2026-00222 (U.S. Pat. No. 12,233,871), IPR2026-00228 (U.S. Pat. No. 12,240,456), IPR2026-00205 (U.S. Pat. No. 12,240,457), and IPR2026-00229 (U.S. Pat. No. 12,240,458).

more motions for *pro hac vice* recognition of back-up counsel pursuant to 37 C.F.R. § 42.10(c)(1) and/or one or more notices of intent to designate a provisionally recognized PTAB attorney as back-up counsel pursuant to 37 C.F.R. § 42.10(c)(2). A motion or notice seeking *pro hac vice* recognition shall not be filed earlier than 21 days after service of the petition, which is the time for filing patent owner mandatory notices.

Notice, Paper 3 at 3. As also identified in the Notice, a motion for *pro hac vice* recognition must be accompanied by the fee set forth in 37 C.F.R. § 42.15(e), and must:

- a. Contain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding; and
- b. Be accompanied by an affidavit or declaration in which the individual seeking *pro hac vice* recognition attests 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 ever 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 37 CFR part 42;
 - vi. The individual will be subject to the USPTO Rules of Professional Conduct set forth in 37 CFR 11.101 *et seq.* and disciplinary jurisdiction under 37 CFR 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 years; and

viii. Familiarity with the subject matter at issue in the proceeding².

Notice, Paper 3 at 4-5.

III. STATEMENT OF FACTS SHOWING GOOD CAUSE

This Motion is being filed at least 21 days after the service of the Petition. (Petition, Paper 1 at Cert. of Service). Patent Owner has already designated a registered practitioner as lead counsel, Michael W. Doell (Reg. No. 79,493), pursuant to 37 C.F.R. 42.10(a), and filed a power of attorney for lead counsel. (Papers 4 and 5).

Mr. Rando is a member in good standing of New York State, United States District Court For The Southern District Of New York, United States District Court For The Eastern District Of New York, United States Supreme Court, United States Court Of Appeals For The Federal Circuit, United States Court Of Appeals For The Armed Forces, United States Court Of Federal Claims, United States Court Of Appeals For The Second Circuit, United States Court Of International Trade, United States District Court For The Northern District Of New York. (Rando Decl. ¶ 2) Mr. Rando has never been suspended or disbarred from practice before any court or administrative body. (*Id.* ¶ 3). No application of Mr. Rando for admission to practice

² The type of familiarity referenced in the Board's rules regarding *pro hac vice* admission is legal familiarity; technical familiarity, though expected, is not required. *See* Expanding Opportunities To Appear Before the Patent Trial and Appeal Board, 89 F.R. 82172, 82175 (Oct. 10, 2024); 37 C.F.R. § 42.10(c)(1).

before any court or administrative body has ever been denied. (*Id.*) No court or administrative body has ever imposed sanctions or contempt citations against Mr. Rando. (*Id.*) Mr. Rando has read, fully understands, 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 Title 37 of the C.F.R. (*Id.* ¶ 4.) Mr. Rando acknowledges and agrees that he will be subject to the USPTO 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). (*Id.*) Mr. Rando has not applied for *pro hac vice* before the Office in the last three years. (*Id.*)

Mr. Rando received a B.S. degree in Mathematics and Computer Science from Hofstra University in 1983. He earned a J.D. degree from St. John's School of Law in 1989. Prior to entering the legal profession, he was a Systems Analysis Engineer at Sperry Corporation (currently Lockheed Martin) for seven years where he performed analysis, under a government required classified security clearance, of the Trident Submarine navigation and weapons subsystems. He designed, developed, implemented, and analyzed computer software utilizing advanced sophisticated high-powered mathematical analysis techniques. (*Id.* ¶ 5)

Mr. Rando joined Patrick Doerr July 15, 2025, as a Partner. He is currently a member of their Intellectual Property group and in charge of their patent litigation. Collectively, since graduating law school, he has practiced patent litigation for over 36 years. total. (*Id.* ¶ 6)

Mr. Rando has familiarity with the subject matter at issue in this proceeding.

Mr. Rando has been actively involved in the underlying district court litigation between the Petitioner and Patent Owner, *Bulletproof Property Management LLC, v. Tesla, Inc.*, Case No. 1:25-cv-00665 (W.D. Tex. 2025) (“Underlying Litigation”), and U.S. Pat. No. 11,932,230 (“’230 Patent”) is at issue in both this proceeding and the Underlying Litigation. (*Id.* ¶ 7) Mr. Rando is lead counsel in the Underlying Litigation and has been actively involved in all aspects of the litigation, including Patent Owner’s factual investigation and development of its claim construction positions, validity positions, and infringement positions regarding the claims of the ‘230 Patent at issue in this proceeding. (*Id.* ¶ 8) Mr. Rando has also been actively involved in analyzing and assisting with the analysis, and eventual response to, the Petition in this proceeding. (*Id.* ¶ 9)

Mr. Rando is familiar with current PTAB IPR practice through participating in and co-moderating the New York Intellectual Property Law Association PTAB Committee Monthly CLE programs. (*Id.* ¶ 10)

Patent Owner respectfully states that, in light of Mr. Rando’s extensive familiarity with the subject matter at issue in this proceeding and in view of the interrelatedness of this proceeding that the Underlying Litigation, Patent Owner has a substantial need for Mr. Rando’s *pro hac vice* admission in this proceeding.

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that Mr. Rando be admitted *pro hac vice* in this proceeding.

Dated: March 6, 2026

Respectfully submitted,

By /s/ Michael Doell

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Counsel for PATENT OWNER

CERTIFICATE OF SERVICE

I certify that on March 6, 2026, the foregoing PATENT OWNER'S UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION OF ROBERT J. RANDO UNDER 37 C.F.R. § 42.10(c) has been served on the Petitioners' counsel of record via email, at the following email addresses:

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