

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JOHNSON CONTROLS INC.,
Petitioner,

v.

FRACTUS S.A.,
Patent Owner.

Case IPR2026-00338
U.S. Patent No. 8,738,103

**PETITIONER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF AHMED M.T. RIAZ
UNDER 37 C.F.R. § 42.10(C)**

Mail Stop: Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

I. INTRODUCTION.....	1
II. STATEMENT OF FACTS	2
III. GOOD CAUSE EXISTS FOR THIS MOTION.....	3
IV. DECLARATION OF AHMED M.T. RIAZ SEEKING TO APPEAR.....	4
V. CONCLUSION	4

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

LIST OF EXHIBITS

Exhibit No.	Material
1030	Declaration of Ahmed M.T. Riaz in Support of Motion for <i>Pro Hac Vice</i> Admission

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(c) and the Notice of Filing Date Accorded, Petitioner Johnson Controls Inc. (“JCI” or “Petitioner”), respectfully requests that the Board recognize Ahmed M.T. Riaz as counsel *pro hac vice* in this proceeding. Petitioner is not seeking to replace either its current lead or back-up lead counsel with Mr. Riaz. Petitioner has conferred with Patent Owner's counsel, who stated Patent Owner does not oppose this motion.

Where the lead counsel is a registered practitioner, a non-registered practitioner may be permitted to appear *pro hac vice* “upon a showing that counsel is an experienced litigating attorney and has established familiarity with the subject matter at issue in the proceeding.” 37 C.F.R. § 42.10(c); *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013) (setting forth requirements for *pro hac vice* admission).

As set forth in the accompanying Declaration (EX1030), Ahmed M.T. Riaz is a Partner at ArentFox Schiff LLP and an experienced patent litigation attorney with significant experience representing clients in patent matters before the courts. Based on the facts detailed below and, in his declaration, Mr. Riaz has significant familiarity with the particular subject matter in this IPR proceeding.

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

This motion is authorized by the Notice of Filing Date Accorded that was mailed on April 22, 2026. *See* Paper 3.

II. STATEMENT OF FACTS

Mr. Riaz has focused his practice on patent law since at least 2011 and has extensive experience representing clients in patent matters before courts and agencies, including U.S. District Courts. EX1030, ¶8. Mr. Riaz has significant knowledge and experience in patent litigation, including through litigating invalidity defenses, preparing witnesses for deposition and materials for taking depositions, and handling evidentiary issues. *Id.*, ¶9.

Mr. Riaz has not previously been involved in proceedings before the Board. Based on his involvement to date, Mr. Riaz has developed an established familiarity with the subject matter of this proceeding, including a close familiarity with the arguments and evidence in the petition. *Id.*, ¶10. He has gained this familiarity through review and analysis of the challenged patent, the prosecution history of the challenged patent, technical literature, the petitioner's expert declaration, and other sources of information. *Id.* Mr. Riaz is a member in good standing of the state bars of New York, New Jersey, and Pennsylvania, and admitted to the United States District Court for the District of New Jersey, United States District Court for the Southern District of New York, and the United States Court of Appeals for the

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz Federal Circuit. *Id.*, ¶2. Mr. Riaz has never been suspended or disbarred from practice before any court or administrative body (*id.*, ¶3), has never been denied admission to practice before any court or administrative body (*id.*, ¶4), and has never received sanctions or contempt citations against him from any court or administrative body (*id.*, ¶5). Mr. Riaz certifies that he 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 37 C.F.R. EX1030, ¶6. Mr. Riaz certifies that he understands that he will be subject to the Rules of Professional Conduct under 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). EX1030, ¶7.

Mr. Riaz certifies that in this proceeding he will work in coordination with lead counsel, Janine A. Carlan, who is a registered practitioner. *Id.*, ¶11.

III. GOOD CAUSE EXISTS FOR THIS MOTION

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause. Based on the facts above, as supported by Mr. Riaz's Declaration (EX1030), there is good cause to admit Mr. Riaz *pro hac vice* in this proceeding given his extensive experience and qualifications (EX1030 ¶¶2, 8-10) and established familiarity with the subject matter at issue in this proceeding (EX1030 ¶10).

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

In addition, Mr. Riaz has significant knowledge and experience in patent litigation, including preparing witnesses for deposition and handling evidentiary issues. *Id.*, ¶¶8-10. These skills are readily applicable to post-grant proceedings and favor admitting Mr. Riaz to represent Patent Owner.

Petitioner will maintain a registered practitioner as lead counsel for at least as long as Mr. Riaz is admitted *pro hac vice*. Mr. Riaz certifies that he will coordinate and associate with the designated lead counsel for Petitioner, Janine A. Carlan, who is a registered practitioner, for the duration of his involvement. EX1030 ¶11.

IV. DECLARATION OF AHMED M.T. RIAZ SEEKING TO APPEAR

This unopposed motion is accompanied by a declaration as required by *Unified Patents, Inc. v. Parallel Iron, LLC*, Case IPR2013-00639, Paper 7 (P.T.A.B. Oct. 15, 2013).

V. CONCLUSION

Petitioner submits there is good cause under 37 C.F.R. § 42.10(c) for the Board to recognize Ahmed M.T. Riaz as counsel *pro hac vice* during this proceeding.

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

Dated: May 14, 2026

Respectfully submitted,

/s/ Janine A. Carlan

Janine A. Carlan, Reg. No. 42,387

ARENTFOX SCHIFF LLP

1717 K Street, NW

Washington, DC 20006-5344

Tel.: 202.857.6000

janine.carlan@afslaw.com

Attorney for Petitioner

Petitioner's Unopposed Motion for Pro Hac Vice Admission of Ahmed M.T. Riaz

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on May 14, 2026, I caused a true and correct copy of the Petitioner's Unopposed Motion for *Pro Hac Vice* Admission of Ahmed M.T. Riaz Under 37 C.F.R. § 42.10(c) to be served via email to the following addresses:

Larry Shatzer
Mark Deboy
Patrick J. Finnan
EDELL, SHAPIRO & FINNAN, LLC
9801 Washingtonian Blvd.
Suite 750
Gaithersburg, MD 20878
Tel: 240-864-2459
lshatzer@esfip.com
mdeboy@esfip.com
pfinnan@esfip.com
Fractus_GeoTab_IPRs@esfip.com

Counsel for Patent Owner

Dated: May 14, 2026

Respectfully submitted,

/s/ Roderick Crawford

Roderick Crawford
Senior Paralegal
ARENTFOX SCHIFF LLP
1717 K Street, NW
Washington, DC 20006
roderick.crawford@afslaw.com