

Filed on behalf of: DANAPAK FLEXIBLES A/S

By: Steven A. Avena
Holland & Hart LLP
1800 Broadway, Suite 300
Boulder, CO 80302
saavena@hollandhart.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HUHTAMAKI FLEXIBLE PACKAGING GERMANY GMBH & CO. KG,
Petitioner,

v.

DANAPAK FLEXIBLES A/S,
Patent Owner.

PGR2023-00008
Patent 11,260,624

MOTION FOR *PRO HAC VICE* ADMISSION – JEFFREY R. ROESER

I. INTRODUCTION

Patent Owner hereby respectfully requests that the Board recognize Mr. Jeffrey R. Roeser as counsel *pro hac vice* during this proceeding. Authorization for the filing of this motion is provided by The Notice of Filing Date Accorded to Petition (Paper 3) dated December 30, 2022, which authorized the parties to this proceeding to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), and noted that such motions should be filed in accordance with the "order - Authorizing Motion for *Pro Hac Vice* Admission" in Case IPR2013-00639, Paper 7. Patent Owner seeks *pro hac vice* admission for Mr. Roeser in this proceeding so as to avail itself of Mr. Roeser's extensive litigation experience.

A. Statement of Facts

Mr. Roeser is an experienced patent litigation attorney, with approximately eight years of experience in fact and expert discovery, Markman hearings, jury trials, and district court oral arguments in patent infringement matters. Mr. Roeser's biography is attached as Exhibit A.

B. Affidavit or Declaration of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is accompanied by the required Affidavit of Mr. Jeffrey R. Roeser.

II. CONCLUSION

Therefore, there is good cause for the Board to recognize Mr. Roeser as counsel *pro hac vice* during this proceeding.

Respectfully submitted on August 8, 2023, by:

/Steven Avena/
Steven A. Avena

Holland & Hart LLP
1800 Broadway, Suite 300
Boulder, CO 80302
Tel: 303.473.2700 • Fax: 303.473.2720

**AFFIDAVIT OF MR. JEFFREY R. ROESER IN SUPPORT OF MOTION
FOR *PRO HAC VICE* ADMISSION**

I, Jeffrey R. Roeser, being duly sworn and upon oath, hereby attest to the following:

1) I am an experienced patent litigator who has practiced in the field of patent law and litigation for approximately 8 years. I have a relationship with the Patent Owner in this proceeding who is expecting me to participate as an attorney of record in view of my experience. I also have familiarity with the subject matter at issue in this proceeding.

2) I am a member in good standing of the Bar of Colorado, the Bar of Texas, the Bar of Arkansas, and of the following Federal Courts:

a) U.S. District Court for the District of Colorado;

b) U.S. District Court for the Northern, Eastern, Southern, and Western Districts of Texas; and

c) U.S. District Court for the Eastern and Western Districts of Arkansas.

3) I have not been suspended or disbarred from practice before any court or administrative body.

4) I have never had an application for admission to practice before any court or administrative body denied.

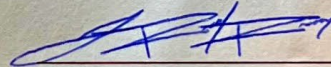
5) No sanction or contempt citation has been imposed against me by any court or administrative body.

6) I have 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.

7) I will be subject to the USPTO's 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).

8) I have not applied to appear *pro hac vice* before the Board in any other proceeding within the past three (3) years.

9) I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further declare that these statements are made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 10-1 of Title 18 of the United States Code.



Jeffrey R. Roeser

PGR2023-00008
Patent No. 11,260,624

STATE OF TEXAS)
) ss.
COUNTY OF BOWIE)

The aforementioned document described as the Affidavit of Mr. Jeffrey R. Roeser in Support of Motion for *Pro Hac Vice* Admission was signed and sworn to before me on this 8th day of August, 2023 by Jeffrey Roeser.



Notary Public of the State of Texas
My Commission expires: 12-21-23

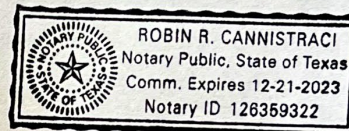


EXHIBIT A



Randy Roeser

Associate

1800 Broadway, Suite 300, Boulder, CO 80302

P 303-447-7196

jrroeser@hollandhart.com

Randy guides clients on the protection and enforcement of intellectual property rights and resolving complex business disputes.

PRACTICES

Intellectual Property

EDUCATION

University of Houston Law Center, J.D.,
2015

magna cum laude

Order of the Barons

Order of the Barristers

Order of the Coif

University of Arkansas, B.A. Chemistry,
2012

magna cum laude

BAR ADMISSIONS

Colorado

Texas

Arkansas

COURT ADMISSIONS

United States District Court for the
District of Colorado

United States District Courts for the
Northern, Eastern, Southern, and
Western Districts of Texas

United States District Courts for the
Eastern and Western Districts of
Arkansas

Randy represents clients in litigation, dispute resolution, and risk management, allowing them to focus on their core business. His clients range from start-ups to multi-national Fortune 500 companies operating across the world in a variety of industries, including software, hardware, power over Ethernet, mobile applications, microchips, and mechanical engineering.

Randy helps clients resolve competitive and legal threats involving patents, trademarks, copyrights, trade secrets, false advertising, contracts, and complex litigation including class action defense. He represents clients in state and federal courts and before administrative bodies, including the Trademark Trial and Appeal Board, and the United States International Trade Commission.

Prior to joining Holland & Hart, Randy practiced as an associate at Haltom & Doan.

EXPERIENCE

- Intellectual Property Litigation
- Patent, Trademark, and Copyright Enforcement Strategies
- TTAB Disputes

RECOGNITION

- 2018 International Association of Defense Counsel's Trial Academy Graduate
- Chickasaw Nation Higher Education Scholar
- American Intellectual Property Law Education Foundation - Sidney B. Williams, Jr. Scholar
- Silas Hunt Distinguished Scholar

PROFESSIONAL AND CIVIC AFFILIATIONS

- State Bar of Texas
 - Intellectual Property Law Section
 - American Indian Law Section
- Texarkana Bar Association

- Arkansas Bar Association
- Harrison County (Texas) Bar Association
- Texarkana Young Lawyers Association
 - o President, 2017-2019

CERTIFICATE OF SERVICE

I, Steven A. Avena, hereby certify that a copy of the foregoing **MOTION FOR *PRO HAC VICE* ADMISSION – JEFFREY R. ROESER** has been served on the attorneys of record of Petitioner Huhtamaki Flexible Packaging Germany GmbH & Co. KG electronically by email as of today, August 8, 2023, at the following electronic addresses:

General Email: litigation@iplawgroup.com

Lead Counsel	Back-Up Counsel
Ryan D. Levy (Reg. No. 58,618) Patterson Intellectual Property Law, P.C. 1600 Division Street, Suite 500 Nashville, TN 37203 Telephone: (615) 242-2400 Facsimile: (615) 242-2221 <u>rdl@iplawgroup.com</u>	Mark A. Kilgore (Reg. No. 75,994) Patterson Intellectual Property Law, P.C. 1600 Division Street, Suite 500 Nashville, TN 37203 Telephone: (615) 242-2400 Facsimile: (615) 242-2221 <u>mak@iplawgroup.com</u> Seth R. Ogden (Reg. No. 65,168) Patterson Intellectual Property Law, P.C. 1600 Division Street, Suite 500 Nashville, TN 37203 Telephone: (615) 242-2400 Facsimile: (615) 242-2221 <u>sro@iplawgroup.com</u> Samuel A. Raque (Reg. No. 77,890) Patterson Intellectual Property Law, P.C. 1600 Division Street, Suite 500 Nashville, TN 37203 Telephone: (615) 242-2400 Facsimile: (615) 242-2221 <u>sar@iplawgroup.com</u>

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