

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MPL BRANDS NV, INC.

Petitioner,

v.

BUZZBALLZ, LLC

Patent Owner.

PTAB Case No. PGR2024-00035

U.S. Patent No. 11,932,441 B1

**PETITIONERS' MOTION FOR PRO HAC VICE ADMISSION OF
ANDREW KALAMARIDES PURSUANT TO 37 C.F.R. § 42.10(C)**

Petitioner MPL Brands NV, Inc. (“Petitioner”) respectfully requests that the Board admit Andrew Kalamarides as back-up counsel *pro hac vice* in this proceeding. Mr. Kalamarides is a patent litigation attorney and has substantial knowledge of the substantive issues concerning invalidity of the challenged claims of the Patent in this proceeding. He is counsel for Petitioner in the related district court proceeding. Therefore, Mr. Kalamarides meets the requirements of “an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding” under 37 C.F.R. §42.10(c).

Time for Filing

This Motion for *Pro Hac Vice* Admission is authorized by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response that was mailed on September 20, 2024 (Paper 7), and is being filed no sooner than twenty one (21) days after service of the Petition.

Statement of Facts

In this proceeding, lead counsel for Petitioner is Babak Tehranchi, a registered practitioner. The following statement of facts demonstrate good cause for the Board to recognize Mr. Kalamarides *pro hac vice*.

Mr. Kalamarides is a patent litigation attorney with one year of experience representing clients in cases involving patents and/or other intellectual property interests. Mr. Kalamarides litigates patent cases before federal district courts in the

United States. He has experience in pre-trial hearings, including *Markman* hearings, as well as both fact and expert discovery. Mr. Kalamarides is admitted to practice in Texas with no disciplinary actions or denials of admission. Mr. Kalamarides' biography is attached as Appendix A to the Declaration of Andrew Kalamarides (Ex. 1018).

Mr. Kalamarides has established familiarity with the subject matter in this proceeding, including as counsel in co-pending district court litigation. Mr. Kalamarides has spent significant time analyzing the challenged patent and the cited prior art references and was involved in preparing and filing the Petition submitted in this Post-Grant Review proceeding. Petitioners have invested significant financial resources in Mr. Kalamarides participation in the foregoing proceedings, and thus respectfully submit good cause exists for the Board to recognize Mr. Kalamarides as counsel *pro hac vice* during this proceeding.

Declaration of Individual Seeking to Appear

This motion for *pro hac vice admission* is accompanied by the Declaration of Andrew Kalamarides (Ex. 1018), which attests to the requirements for *pro hac vice* admission set forth in the Order Authorizing Motion for *Pro Hac Vice* Admission 37 C.F.R. § 42.10, *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (P.T.A.B. Oct. 25, 2013).

Pro Hac Vice Admission Fee

The required fee under 37 C.F.R. § 42.15(e) in the amount of \$250 is concurrently being paid by credit card.

Conclusion

Petitioners submit good cause exists under 37 C.F.R. § 42.10(c) for the Board to admit Andrew Kalamarides as counsel *pro hac vice* and to authorize Mr. Kalamarides to represent Petitioners as back-up counsel in this proceeding.

Dated: January 8, 2025

Respectfully submitted,

PERKINS COIE LLP
11452 El Camino Real, Suite 300
San Diego, CA 92130
Telephone: (858) 720-5700
Fax: (858) 720-5834

/Babak Tehranchi/

Lead Counsel
Babak Tehranchi, Reg. No. 55,937

Back-up Counsel
M. Craig Tyler, Reg. No. 41,519
Daniel T. Shvodian, Reg. No. 42,148
R. Tyler Kendrick, Reg. No. 73,930
Andrew Kalamarides, *pro hac vice* to be
submitted

Attorneys for Petitioner
MPL Brands NV, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing **MOTION FOR PRO HAC VICE ADMISSION OF ANDREW KALAMARIDES PURSUANT TO 37 C.F.R. § 42.10(C)** was served by electronic mail on January 8, 2025, on the Patent Owner via its attorneys of record:

greg.webb.ipr@haynesboone.com
alan.herda.ipr@haynesboone.com
jason.whitney.ipr@haynesboone.com
zachary.halbur.ipr@haynesboone.com
brooke.cohen.ipr@haynesboone.com
adam.erickson.ipr@haynesboone.com

Dated: January 8, 2024

/Anita Chou/

Anita Chou
Paralegal