

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

**PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF
HELENA BURNS PURSUANT TO 37 C.F.R. § 42.10(C)**

EXHIBIT LIST

Exhibit	Description
EX1001	U.S. Patent No. 11,932,441 B1 (“’441 patent”)
EX1002	Declaration of Nathan J. Delson, PhD (“Delson”)
EX1003	Prosecution File History of US Design Patent Application 29/824,813
EX1004	Prosecution File History of ’441 Patent
EX1005	Declaration of Joseph T. Norris (“Norris”)
EX1006	Coca-Cola Plastic Can Marketing Material
EX1007	The American Heritage Dictionary
EX1008	U.S. Patent No. 8,524,349 B2 to Protais et al. (“Protais”)
EX1009	U.S. Patent No. 4,405,546
EX1010	U.S. Patent No. 8,141,741 B2 to Metzger, et al. (“Metzger”)
EX1011	U.S. Patent No. 4,465,204 to Kaminski (“Kaminski”)
EX1012	U.S. Patent No. 6,729,495 B2 to Gardiner (“Gardiner”)
EX1013	U.S. Patent No. 6,585,123 B1 to Pedmo et al. (“Pedmo”)
EX1014	U.S. Patent No. 4,024,981 to Brown (“Brown”)
EX1015	The 1985 Los Angeles Times Article
EX1016	The 1985 New York Times Article
EX1017	Handbook of Engineering and Specialty Thermoplastics
EX1018	Declaration in Support of Petitioners’ Motion for Pro Hac Vice Admission of Andrew Kalamarides
EX1019	Reply Declaration of Nathan J. Delson, PhD (“Delson Reply”)
EX1020	Reply Declaration of Joseph T. Norris (“Norris Reply”)
EX1021	US Patent Application No. 12/762,934

Exhibit	Description
EX1022	Transcript of Deposition Dr. Rojas, May 28, 2025 (“Rojas Depo.”)
EX1023	Declaration of Helena Burns

Petitioner MPL Brands NV, Inc. (“Petitioner”) respectfully requests that the Board admit Helena Burns as back-up counsel *pro hac vice* in this proceeding. Ms. Burns is a patent litigation attorney, who has assisted with the related district court litigations and *inter partes* review proceedings. Therefore, Ms. Burns 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).

I. 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 June 20, 2024 (Paper No. 4). This Motion is filed no sooner than twenty-one (21) days after service of the Petition.

II. STATEMENT OF FACTS

In this proceeding, lead counsel for Petitioner is Daniel Shvodian, a registered practitioner. The following statement of facts demonstrates good cause for the Board to recognize Ms. Burns *pro hac vice*.

Ms. Burns is a patent litigation attorney representing clients in cases involving patents or other intellectual property interests. (Affidavit of Helena Burns (“Burns Affidavit”), ¶ 7 in Exhibit 1023.) She is a member in good standing of the State Bar of Texas.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This motion for *pro hac vice* admission is accompanied by the Affidavit of Ms. Burns (Exhibit 2023), as required.

IV. CONCLUSION

Accordingly, Patent Owner submits that there is good cause under 37 C.F.R. 42.10(c) for the Board to admit Helena Burns as counsel *pro hac vice* and to authorize Ms. Burns to represent Patent Owner as back-up counsel in this proceeding.

Dated: August 14, 2025

Respectfully submitted,

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

/Daniel T. Shvodian/

Lead Counsel
Daniel T. Shvodian, Reg. No. 42,148

Back-up Counsel
Babak Tehranchi, Reg. No. 55,937
M. Craig Tyler, Reg. No. 41,519
R. Tyler Kendrick, Reg. No. 73,930
Andrew Kalamarides, *pro hac vice*
Helena Burns, *pro hac vice*

Attorneys for Petitioner
MPL Brands NV, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2025, a true and correct copy of the foregoing **PETITIONER'S MOTION FOR PRO HAC VICE ADMISSION OF HELENA BURNS PURSUANT TO 37 C.F.R. § 42.10(C) and EXHIBIT 1023** was served by electronic mail on the Patent Owner via its attorneys of record:

Gregory P. Webb - greg.webb.ipr@haynesboone.com
Alan N. Herda - alan.herda.ipr@haynesboone.com
Jason W. Whitney - jason.whitney.ipr@haynesboone.com
Zachary A. Halbur - zachary.halbur.ipr@haynesboone.com
Brooke E. Cohen - brooke.cohen.ipr@haynesboone.com
Adam Erickson - adam.erickson.ipr@haynesboone.com

Dated: August 14, 2025

/ Kate Rose /

Kate Rose
Senior Paralegal