

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FRONTIER WATER SYSTEMS, LLC
Petitioner

v.

GENERAL ELECTRIC CORPORATION
Patent Owner

U.S. Patent No. 7,790,034

Filing Date: January 22, 2008

Issue Date: September 7, 2010

Title: Apparatus and Method for Treating FGD Blowdown or Similar Liquids

Inter Partes Review Case No. IPR2017-01468

**PETITIONER FRONTIER WATER SYSTEMS, LLC'S
MOTION FOR *PRO HAC VICE* ADMISSION
OF MICHAEL D. ROUNDS 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, Virginia 22313

Pursuant to 37 C.F.R. § 42.10(c), Petitioner, FRONTIER WATER SYSTEMS, LLC (“Frontier”), by and through its attorneys, hereby respectfully moves for the *pro hac vice* admission of Michael D. Rounds. In support of this motion, Petitioner states as follows:

Good cause exists under 37 C.F.R. § 42.10(c) for the *pro hac vice* admission of Michael D. Rounds as backup counsel in this matter. Mr. Rounds of Brownstein Hyatt Farber and Schreck LLP represents the Petitioner Frontier in the related patent infringement action in the District of Utah (Case No. 2:17-cv-00261) (the “Utah Litigation”). The Utah Litigation involves the same Patent Owner and the same patent, U.S. Patent No. 7,790,034 (“US’034 ”), at issue in this Petition. Mr. Rounds has become intimately familiar with US’034 patent and its validity issues during pre-filing negotiations and the drafting of the Petition for institution of the *Inter Partes Review* of US’034. In addition, Mr. Rounds has spent over twenty-five years practicing patent litigation before United States District Courts and the United States Court of Appeals for the Federal Circuit.

Petitioner wishes to have Mr. Rounds assist in this matter. Pursuant to the requirements of 37 C.F.R. § 42.10(c), Adam K. Yowell, a registered practitioner, will remain as lead counsel in this matter. Mr. Yowell is an associate at Brownstein Hyatt Farber and Schreck, LLP. Pursuant to the requirements of the “Order Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639

(superseding the similar Order in Case IPR2013-00010), this Motion is also supported by the attached Declaration of Michael D. Rounds (Exhibit FWS-1023).

For the foregoing reasons, and in view of the Declaration submitted herewith, Petitioner submits that good cause exists for the *pro hac vice* admission of Michael D. Rounds and respectfully requests that the Board grant this Motion.

Dated: May 24, 2017

Respectfully submitted,
Brownstein Hyatt Farber Schreck,

/ Adam K. Yowell /

Adam K. Yowell (Reg. No. 69,955)

Email: ayowell@bhfs.com

5371 Kietzke Lane

Reno, NV 89511

Telephone: (775) 324-4100

Facsimile: (775) 333-8171

Attorney for Petitioner, Frontier Water
Systems, LLC

CERTIFICATE OF SERVICE
CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b) on the Patent Owner by overnight mail of a copy of this Petition for *Inter Partes* Review and Exhibits FWS1001-FWS1022, at the correspondence address of record for U.S. Patent No. 7,790,034, and also Barbara Toop, corporate counsel for GE, at the following addresses:

Scott Pundsack
Bereskin & Parr (Mississauga) / GE
Scotia Plaza
40 King Street West, 40th Floor
Toronto ON M5H 3Y2
Canada

Barbara A. Toop
GE Power
Water & Process Technologies
4636 Somerton Road
Trevose, PA 19053

Dated: May 24, 2017

/ Adam K. Yowell /
Adam K. Yowell
Attorney for Petitioner,
Frontier Water Systems, LLC