

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

3M COMPANY, MERCK & CO., INC., and
MERCK SHARP & DOHME CORP.,
Petitioner,

v.

APTAR FRANCE SAS,
Patent Owner.

Case IPR2018-01055
Patent 9,370,631 B2

**PATENT OWNER’S CORRECTED MOTION FOR *PRO HAC VICE*
ADMISSION OF ROBERT M. MANLEY UNDER 37 C.F.R. § 41.10(c)**

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

In light of the Board’s Order Denying Without Prejudice Patent Owner’s Motion for Admission *Pro Hac Vice* of Ryan A. Hargrave and Robert Manley (Paper 13), Aptar France SAS and AptarGroup, Inc. (collectively, “Patent Owner”) hereby submits this corrected motion, respectfully requesting that the Board recognize Robert M. Manley, Esq., as counsel *pro hac vice* during this proceeding.

I. BACKGROUND

Patent Owner’s Corrected Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the “Order—Authorizing Motion for Pro Hac Vice Admission” in Case No. IPR2013-00639 (MPT) [“the Order”].

II. STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Mr. Manley *pro hac vice*.

Mr. Manley is an experienced litigation attorney and has been involved in numerous complex litigations in state and federal courts. Mr. Manley biography was previously submitted as Exhibit 2004.

Mr. Manley has reviewed U.S. Patent No. 9,370,631, and the petition already filed in this proceeding. Further, Mr. Manley is counsel of record in the co-pending litigation between the parties entitled *AptarGroup, Inc. et. al. v. 3M Company et al.*, before the U.S. District Court for the Northern District of Illinois,

Case No. 1:17-cv-06294-VMK; and, as such, is familiar with the subject matter at issue in this proceeding.

Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Manley as counsel *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Corrected Motion for *Pro Hac Vice* Admission is accompanied by the Declaration of Robert M. Manley, filed as Exhibit 2013, as required by the Order.

Respectfully submitted,

Patent Owner

Dated: November 15, 2018

By: /s/ Ashley N. Moore

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the foregoing Patent Owner's Corrected Motion for Admission *Pro Hac Vice* of Robert M. Manley and Exhibit 2013 were served electronically via e-mail on November 15, 2018, on the following counsel of record for Petitioners:

Steven D. Maslowski
AKIN GUMP STRAUSS HAUER & FELD LLP
Gregory A. Morris
Ron N. Sklar (to be admitted *pro hac vice*)
HONIGMAN MILLER SCHWARTZ AND COHN LLP
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Dated: November 15, 2018

By: /s/ Ashley N. Moore

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