

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
*Petitioner,*

v.

MICHIGAN MOTOR TECHNOLOGIES LLC,  
*Patent Owner*

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Case IPR2020-00446

U.S. Patent No. 6,763,804

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION  
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, VA 22313-1450  
*Submitted Electronically via PTAB E2E*

## **I. STATEMENT OF THE PRECISE RELIEF REQUESTED**

Pursuant to the March 13, 2020 Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 5) and 37 C.F.R. §§ 42.10(c) and 42.22, Patent Owner Michigan Motor Technologies, LLC (“MMT” or “Patent Owner”) respectfully requests that the Board recognize Robyn T. Williams of Devlin Law Firm LLC as backup counsel *pro hac vice* during this proceeding. This Motion for *Pro Hac Vice* Admission is filed in accordance with the “Order -- Authorizing Motion for *Pro Hac Vice* Admission” in Case IPR2013-00639 (hereinafter “Admission Order”) as requested.

## **II. TIMING OF FILING**

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty-one (21) days after service of the petition as required by the Admission Order.

## **III. STATEMENT OF FACTS**

The following statement of facts shows that there is good cause for the Board to recognize Ms. Williams *pro hac vice*. Ms. Williams is an experienced litigation attorney and has an established familiarity with the subject matter at issue in this proceeding.

Ms. Williams has 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 the C.F.R.

Ms. Williams will be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. § 10.20 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

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

#### **IV. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR**

This Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Ms. Robyn Williams (Exhibit 2002) as required by the Admission Order.

Dated: June 26, 2020

DEVLIN LAW FIRM LLC

/s/ Timothy Devlin

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## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on June 26, 2020, the foregoing document is being served via electronic mail upon the following counsel of record for Petitioner:

<b>LEAD COUNSEL</b>  Michael D. Specht (Reg. 54,463) mspecht-PTAB@sternekessler.com PTAB@sternekessler.com  Postal and Hand-Delivery Address: Sterne, Kessler, Goldstein & Fox PLLC 1100 New York Avenue, N.W. Washington, D.C. 20005 Tel.: 202-371-2600	<b>BACKUP COUNSEL</b>  Jason A. Fitzsimmons (Reg. 65,367) <a href="mailto:jfitzsimmons-PTAB@sternekessler.com">jfitzsimmons-PTAB@sternekessler.com</a>  <b>ADDITIONAL BACKUP COUNSEL</b>  Daniel E. Yonan (Reg. 53,812) <a href="mailto:dyonan-PTAB@sternekessler.com">dyonan-PTAB@sternekessler.com</a>  Richard Bemben (Reg. 68,658) <a href="mailto:rbemben-PTAB@sternekessler.com">rbemben-PTAB@sternekessler.com</a>  Tyler J. Dutton (Reg. 75,069) tdutton-PTAB@sternekessler.com  Postal and Hand-Delivery Address: Sterne, Kessler, Goldstein & Fox PLLC 1100 New York Avenue, N.W. Washington, D.C. 20005 Tel.: 202-371-2600
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/s/ Timothy Devlin  
Timothy Devlin