

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CRS ADVANCED TECHNOLOGIES, INC.
Petitioner

v.

Patent of FRONTLINE TECHNOLOGIES, INC.
Patent Owner

Case CBM2012-00005
Patent 6,675,151C1

**PETITIONER CRS ADVANCED TECHNOLOGIES, INC.'s
MOTION FOR ADMISSION *PRO HAC VICE*
OF DARREL C. KARL**

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

I. Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioner, CRS Advanced Technologies, Inc., requests that the Board admit Darrel C. Karl *pro hac vice* in this proceeding.

II. Statement of Facts Showing There is Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. Section 42.10(c) indicates that, “where lead counsel is a registered practitioner, a motion to appear *pro hac vice* may be granted upon a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” The facts here establish good cause for the Board to recognize Darrel C. Karl *pro hac vice* during this proceeding.

1. Lead counsel, E. Robert Yoches, is a registered practitioner.
2. Counsel, Darrel C. Karl, is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion is the Declaration of Darrel C. Karl in Support of Motion for Admission *Pro Hac Vice* (“Karl Declaration”). In the Karl Declaration, Mr. Karl states, *inter alia*, that: “I am a member in good standing of the Bars of the State of Maryland and the District of Columbia and am also admitted to practice in the U.S. Court of Appeals for the Federal Circuit and in the U.S. Supreme Court. I am currently admitted to practice *pro hac vice* in the U.S. District Court for the Eastern District of Pennsylvania. I have been in private practice since 1986, and have been litigating patent cases continuously since that time.” Karl Declaration at ¶ 2.

3. Mr. Karl also states that: “I am very familiar with the subject matter at issue in this proceeding. I am counsel for Defendant CRS in the Frontline Technologies, Inc. v. CRS, Inc. patent infringement litigation, Civil Action No. 2:07-cv-2457 (E.D. Pa.), which involves the same patent at issue in this proceeding. Since that lawsuit was filed in 2007, I have been responsible for the day-to-day management and conduct of that litigation for my client. I have drafted in whole or in part every substantive paper filed in that litigation, defended every deposition of CRS witnesses and experts, and personally deposed of all but two of Frontline’s witnesses and experts.” *Id.* at ¶ 10.

4. In the Karl Declaration, Mr. Karl attests, *inter alia*, that he has read and will comply with Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, and agrees to 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). Karl Declaration at ¶¶ 7-8.

III. Conclusion

For the foregoing reasons, Petitioner, CRS Advanced Technologies, Inc., respectfully requests that the Board admit Darrel C. Karl *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: January 29, 2013

By: /s/ E. Robert Yoches
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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2013, a true and correct copy of the foregoing PETITIONER CRS ADVANCED TECHNOLOGIES, INC.'s MOTION FOR ADMISSION *PRO HAC VICE* OF DARREL C. KARL and DECLARATION OF DARREL C. KARL IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*, were served via electronic mail and overnight courier upon the following counsel of record for Patent Owner Frontline

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