Paper No. ____ Filed: May 31, 2022

BEFORE THE PATENT TRIAL AND APPEAL BOARD
MYLAN PHARMACEUTICALS, INC., CELLTRION, INC., a
APOTEX, INC.,
Petitioners,
V.
REGENERON PHARMACEUTICALS, INC., Patent Owner.
IPR2021-00881 ¹
Patent No. 9,254,338
PETITIONER CELLTRION, INC. UNOPPOSED MOTIO
FOR PRO HAC VICE ADMISSION OF BRIGID MORRIS UNDER 37 C.F.R. § 42.10(c)

¹ IPR2022-00258 has been joined with this proceeding.



I. PRECISE RELIEF REQUSTED

Pursuant to 37 C.F.R. § 42.10(c), Celltrion, Inc. ("Petitioner") respectfully requests that the Board recognize Brigid Morris as counsel *pro hac vice* in this proceeding. Patent Owner (Regeneron) and the other Petitioners (Mylan and Apotex) have indicated that they will not oppose. The Declaration of Ms. Morris (EX1179) accompanies this motion.

II. STATEMENT OF FACTS

- 1. Ms. Morris is a member in good standing of the Bar of the State of New York and is admitted to practice before the United States District Courts for the Southern District of New York and the Eastern District of New York, and the United States Court of Appeals for the Federal Circuit. EX1179 ¶7.
- 2. Ms. Morris has not been suspended or disbarred from practice before any court or administrative body. Id., ¶8.
- 3. No court or administrative body or administrative body has denied an application for admission from Ms. Morris. *Id.*, ¶9.
- 4. No court or administrative body has imposed sanctions or contempt citations on Ms. Morris. *Id.*, ¶10.
- 5. Ms. Morris has read and will comply with the Office Patent Trial Practice Guide (and update) and the Board's Rules of Practice for Trials set forth in part 42 of title 37 of the Code of Federal Regulations. *Id.*, ¶11.



- 6. Ms. Morris agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.*, ¶12.
- 7. Ms. Morris has not applied to appear *pro hac vice* before the Office in the last three years. Id., ¶13.
- 8. Ms. Morris is an associate at Gemini Law and is a patent litigation attorney with experience representing clients in multiple jurisdictions, including United States District Courts and the Federal Circuit Court of Appeals.
- 9. Ms. Morris has reviewed U.S. Patent No. 9,254,338 and the submission of the parties in the present proceeding.

III. REASONS FOR THE REQUESTED RELIEF

Petitioner Celltrion has an established relationship with Brigid Morris, which Celltrion wishes to continue. Ms. Morris' educational background, litigation experience, successful admission to other tribunals, and experience with this proceeding in particular make her well suited for *pro hac vice*.

IV. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Brigid Morris (EX1179).



V. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Brigid Morris as counsel *Pro Hac Vice* in this proceeding.

Respectfully submitted,

Dated: May 31, 2022 /Lora M. Green/

Lora M. Green, Lead Counsel

Reg. No. 43,541



CERTIFICATE OF SERVICE

This is to certify that I caused to be served true and correct copy of the foregoing Motion for Pro Hac Vice Admission Under 37 C.F.R. § 42.10(c) on this 31st day of May 2022, on the Patent Owner at the correspondence address of the Patent Owner as follows:

Deborah Fishman <u>Deborah.fishman@arnoldporter.com</u>

David Caine <u>David.Caine@arnoldporter.com</u>

Alice Sin Yu Ho
<u>Alice.ho@arnoldporter.com</u>

Victoria Reines <u>Victoria.Reines@arnoldporter.com</u>

Jeremy Cobb <u>Jeremy.Cobb@arnoldporter.com</u>

Daniel Reisner <u>Daniel.Reisner@arnoldporter.com</u>

Matthew Wilk <u>Matthew.Wilk@arnoldporter.com</u>

 $\underline{Regeneron Eylea IPRs@arnoldporter.com}$

And to Counsel for Petitioner Mylan Pharmaceuticals in IPR2021-00881, as follows:

Paul Molino <u>paul@rmmslegal.com</u>

William A. Rakoczy <u>wrakoczy@rmmslegal.com</u>



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

