

Case IPR2022-00545
U.S. Patent No. 9,689,161

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHANEL, INC.,

Petitioner,

v.

MOLO DESIGN, LTD.,

Patent Owner.

Case IPR2022-00545

U.S. Patent 9,689,161

**PATENT OWNER'S MOTION FOR
PRO HAC VICE ADMISSION OF CONOR M. CIVINS
UNDER 37 C.F.R. § 42.10(c)**

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I. INTRODUCTION

Patent Owner respectfully submits this Motion for Pro Hac Vice Admission of Conor M. Civins under 37 C.F.R. § 42.10(c) (“Motion”) in connection with IPR2022-00545.

This Motion is filed as authorized by the Notice (Paper 3) and in accordance with the Board’s representative Order in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (PTAB Oct. 15, 2013). This Motion is filed no sooner than 21 days after service of the petition in this proceeding.

Patent Owner has paid the requisite fees and the Office is authorized to charge Deposit Account No. 50-0259 any other applicable fees for this Motion.

II. STATEMENT OF FACTS

Patent Owner respectfully submits that this Motion and the accompanying Declaration of Conor M. Civins (“Civins Declaration”) establish good cause for the Board to recognize Mr. Civins pro hac vice during this proceeding.

1. Bar Membership

Mr. Civins is a member in good standing of the State Bar of Texas. Civins Declaration at ¶4.

2. No Suspensions or Disbarments

Mr. Civins has not been suspended or disbarred from practice before any court or administrative body. Civins Declaration at ¶5.

3. No Denied Applications

Mr. Civins has not had any applications for admission to practice before any court or administrative body ever denied. Civins Declaration at ¶6.

4. No Sanctions of Contempt Citations

Mr. Civins has not had any sanctions or contempt citations imposed on him by any court or administrative body. Civins Declaration at ¶7.

5. Compliance with the TPG and the Board's Rules

Mr. Civins has read and will comply with the Office Patent Trial Practice Guide ("TPG") and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R. Civins Declaration at ¶8.

6. USPTO Rules of Professional Conduct and Disciplinary Jurisdiction

Mr. Civins understands and agrees he will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et. seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Civins Declaration at ¶9.

7. Applications for Pro Hac Vice Admission

Mr. Civins is seeking *pro hac vice* admission representing Patent Owner Molo Design Ltd. in the following proceedings:

- IPR2022-0543
- IPR2022-0544
- IPR2022-0545
- IPR2022-0546

8. Familiarity with the Subject Matter

Mr. Civins is familiar with the subject matter at issue in this proceeding. Civins Declaration at ¶11. Mr. Civins has reviewed the papers and accompanying exhibits filed in this proceeding. *Id.* Mr. Civins is the lead litigation attorney for Patent Owner Molo Design Ltd. in the related district court litigation, *Molo Design, Ltd. v. Chanel, Inc.*, Civil No. 21-CV-1578 (VEC) (S.D.N.Y.) (“S.D.N.Y. Litigation”). *Id.* at ¶12. Mr. Civins also has an established familiarity with the portfolio of patents assigned to Molo Design Ltd, including U.S. Patent Nos. 7,866,366, 8,561,666, 9,689,161 and 9,797,134 asserted in the S.D.N.Y. Litigation and at issue in the proceedings listed *infra* in Paragraph 7. *Id.*

Mr. Civins is an experienced litigation attorney. *Id.* at ¶13. Mr. Civins has been litigating intellectual property and patent cases for over 15 years. *Id.* Mr. Civins has been practicing law since 2003 and has extensive experience litigating patent infringement cases in many different district courts across the United States, as well as at the Federal Circuit. *Id.* Mr. Civins’ experience in patent litigation matters includes all aspects of patent litigation including patent jury trials, arguing Markman

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