

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASSA ABLOY AB, ASSA ABLOY INC., ASSA ABLOY RESIDENTIAL
GROUP, INC., AUGUST HOME, INC., HID GLOBAL CORPORATION,
ASSA ABLOY GLOBAL SOLUTIONS, INC.,
Petitioner,

v.

CPC PATENT TECHNOLOGIES PTY LTD.,
Patent Owner.

Case IPR2022-01006
Patent 9,665,705

**PATENT OWNER'S RENEWED MOTION FOR *PRO HAC VICE*
ADMISSION OF NICHOLAS A. GEIGER
PURSUANT TO 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), Patent Owner CPC Patent Technologies Pty Ltd., (“CPC”) hereby submits this unopposed motion for Nicholas A. Geiger to appear *pro hac vice*. Patent Owner respectfully requests the Board to recognize Mr. Geiger as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so as shown below.

I. AUTHORIZATION FOR THIS MOTION

This renewed motion is authorized by the Board’s Order denying without prejudice Patent Owner’s motion for *pro hac vice* admission of Steven M. Coyle and Nicholas A. Geiger (Paper 11) as well as the Notice of Filing Date Accorded to Petition (“Notice”) (Paper 3) in the IPR and is made no sooner than twenty-one (21) days after service of the Petition.

II. GOOD CAUSE EXISTS

Pursuant to the Notice, the following statement of facts shows that good cause exists for the Board to recognize Mr. Geiger *pro hac vice*.

Lead counsel for this proceeding, Andrew C. Ryan, is a registered practitioner (Registration No. 43,070).

Mr. Geiger is an experienced litigation attorney with over fifteen (15) years of litigation experience. Ex. 2030 ¶ 9. He has been involved in dozens of patent infringement cases in federal district courts across the United States. *Id.* He has

experience in various aspects of patent infringement matters, including all aspects of litigation leading up to and including jury trials and bench trials. *Id.*

Mr. Geiger is a member in good standing of the Bars of the State of Connecticut and the District of Columbia and is admitted to practice before the U.S. Court of Appeals for the Federal Circuit and the U.S. District Court for the District of Connecticut. *Id.* at ¶ 2.

Mr. Geiger has not been suspended or disbarred from practice, has never had any application for admission to practice denied, and has never had any sanctions or contempt citations imposed against him. *Id.* at ¶¶ 3-5. Mr. Geiger has not applied to appear pro hac vice before the Office in any proceedings in the last three (3) years. *Id.* at ¶ 7.

Mr. Geiger has obtained substantial familiarity with the involved patent, the prior art, and the various issues raised in this proceeding and is serving as counsel in the co-pending district court litigation, *ASSA ABLOY AB et al. v. CPC Patent Technologies Pty. Ltd., and Charter Pacific Corporation Ltd.*, Case No. 3:22-cv-694-MPS (D. Conn.). *Id.* at ¶ 10. Moreover, Mr. Geiger has reviewed the involved patent, the Petition, the prior art, and all other cited materials. *Id.* Given his extensive patent litigation experience and familiarity with the Petition, the cited materials, and the patented technology, Mr. Geiger has established familiarity with the subject matter at issue in this proceeding. *Id.*

Mr. Geiger has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in Part 42 of Title 37 of the Code of Federal Regulations, and he agrees to be subject to the USPTO's Code of Professional Conduct as set forth in 37 C.F.R. §§ 11.101 et seq., and to disciplinary jurisdiction under 37 C.F.R. §§ 11.19(a). *Id.* at ¶¶ 6, 8.

Mr. Geiger will also apply to appear pro hac vice in related Case Nos. IPR2022-01045, IPR2022-01089, IPR2022-01093, and IPR2022-01094.

Given Mr. Geiger's familiarity with the subject matter at issue in this proceeding, Patent Owner respectfully submits that it has shown good cause for the Board to recognize Mr. Geiger as counsel pro hac vice during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion is accompanied by the Revised Declaration of Nicholas A. Geiger (Ex. 2030).

Respectfully submitted,

Dated: September 27, 2022

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on this 27th day of September, 2022, service of the foregoing document was made on the counsel of record for the Petitioner by filing this document through the PTAB's E2E System as well as delivering a copy via electronic mail to the following address:

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Dated: September 27, 2022

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