

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ENSIGN US SOUTHERN DRILLING LLC,  
Petitioner,

v.

C&M OILFIELD RENTALS, LLC  
D/B/A C-MOR ENERGY SERVICES  
Patent Owner.

Case No. IPR2023-00804

Patent 10,976,016

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**PATENT OWNER'S  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF  
KARON N. FOWLER PURSUANT TO 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10 (c), Patent Owner C&M Oilfield Rentals, LLC d/b/a C-MOR Energy Services (“Patent Owner”) hereby submits this motion for Karon N. Fowler to appear *pro hac vice* in this proceeding. Patent Owner respectfully requests the Board to recognize Ms. Fowler as counsel *pro hac vice* during this proceeding and demonstrates good cause for doing so as shown below. Patent Owner conferred with Petitioner, and Petitioner confirmed that it does not oppose this Motion.

**I. AUTHORIZATION FOR THIS MOTION**

This motion is authorized by the Notice of Filing Date Accorded to Petition (“Notice”) (Paper 5) 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 Ms. Fowler *pro hac vice*.

Lead counsel for this proceeding, Dion M. Bregman, is a registered practitioner (Registration No. 45,645).

Ms. Fowler is an attorney with over eight years of litigation experience. Ex. 2004 ¶ 9. She has been involved in dozens of patent infringement cases in federal district courts across the United States. *Id.* She 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.*

Ms. Fowler is a member in good standing of the Bars of the States of California and Illinois. *Id.* at ¶ 2. She is admitted to practice before the U.S. Courts of Appeals for the Federal and the Ninth Circuits and the following U.S. District Courts: the Northern District of California, the Central District of California, the Eastern District of California, and the Southern District of California. *Id.*

Ms. Fowler has not been suspended or disbarred from practice before any court or administrative body. She has never had any application for admission to practice denied, and she has never had any sanctions or contempt citations imposed against her. *Id.* at ¶ 3-6.

Ms. Fowler has obtained substantial familiarity with the subject matter at issue in this proceeding. *Id.* at ¶ 10. She has reviewed in detail and is familiar with U.S. Patent No. 10,976,016, the Petition, and all exhibits relied upon by Petitioner in this proceeding. *Id.* In addition, Ms. Fowler is serving as counsel in the co-pending district court litigation, *C&M Oilfield Rentals, LLC d/b/a C-MOR Energy Services v. Ensign US Southern Drilling LLC*, Case No. 4:22-cv-00965 (S.D. Tex.). *Id.*

Ms. Fowler 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. *Id.* at ¶ 7-8. Ms. Fowler acknowledges and 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.*

In the last three (3) years, Ms. Fowler has not appeared *pro hac vice* before this administrative body. *Id.* at ¶ 5. However, Ms. Fowler will also apply to appear *pro hac vice* in Case No. IPR2024-00005. *Id.*

Because Ms. Fowler is an experienced litigation attorney and has established familiarity with the subject matter at issue in the proceeding, Patent Owner respectfully submits that it has shown good cause for the Board to recognize Ms. Fowler as counsel *pro hac vice* during this proceeding.

### **III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR**

This Motion is accompanied by the Declaration of Karon N. Fowler.

### **IV. CONCLUSION**

For the foregoing reasons, Patent Owner respectfully requests the Board admit Karon N. Fowler *pro hac vice* in this proceeding.

Dated: December 11, 2023

Respectfully Submitted,

/ Dion M. Bregman /  
Dion M. Bregman, Reg. No. 45,645

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