

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

**PATENT OWNER'S
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF
GENNADIY T. LOZNEV 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 Gennadiy T. Loznev to appear *pro hac vice* in this proceeding. Patent Owner respectfully requests the Board to recognize Mr. Loznev 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 Mr. Loznev *pro hac vice*.

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

Mr. Loznev joined Morgan, Lewis & Bockius LLP as an intellectual property litigation attorney in October 2022. Ex. 2005 ¶ 9. While at Morgan, Lewis & Bockius LLP, Mr. Loznev primarily focused his practice on patent litigation. *Id.* Mr. Loznev has experience conducting technical infringement and

validity analyses, working with technical experts to prepare reports on infringement and validity issues, briefing and preparing for hearing on claim construction issues, and preparing for and assisting in patent litigation trials across the country before district courts and the United States International Trade Commission. *Id.*

Ms. Loznev is a member in good standing of the Bar of the State of California. *Id.* at ¶ 2. He is admitted to practice before the Northern and the Central Districts of California. *Id.*

Mr. Loznev has not been suspended or disbarred from practice before any court or administrative body. He has never had any application for admission to practice denied, and he has never had any sanctions or contempt citations imposed against him. *Id.* at ¶ 3-6.

Mr. Loznev has obtained substantial familiarity with the subject matter at issue in this proceeding. *Id.* at ¶ 10. He 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.*

Mr. Loznev 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. Mr. Loznev 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, Mr. Loznev has not appeared *pro hac vice* before this administrative body. *Id.* at ¶ 5. However, Mr. Loznev will also apply to appear *pro hac vice* in Case No. IPR2024-00005. *Id.*

Because Mr. Loznev 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 Mr. Loznev as counsel *pro hac vice* during this proceeding.

III. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion is accompanied by the Declaration of Gennadiy T. Loznev.

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests the Board admit Gennadiy T. Loznev *pro hac vice* in this proceeding.

Dated: December 11, 2023

Respectfully Submitted,

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

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), lead counsel for Patent Owner hereby certifies that on December 11, 2023, a copy of this PATENT OWNER'S MOTION FOR PRO HAC VICE ADMISSION OF GENNADIY T. LOZNEV was served to the email correspondence address of record for Petitioner's counsel of record:

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Dated: December 11, 2023

Respectfully Submitted,

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