

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

PGR2025-00054
Patent 12,156,781

**PATENT OWNER'S MOTION
FOR PRO HAC VICE ADMISSION
OF JOHN L. GIBBONS**

February 5, 2026

Pursuant to 37 C.F.R. § 42.10(c)(1), Patent Owner Smart Denture Conversions, LLC respectfully requests the pro hac vice admission of John L. Gibbons as back-up counsel for Patent Owner in this proceeding. Petitioner consents to this motion. A declaration by John L. Gibbons in support of this motion is submitted herewith as Exhibit 2021.

1. Mr. Gibbons is an associate at the law firm of Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan LLP.

2. Mr. Gibbons is an experienced litigation attorney and is an active member in good standing of the North Carolina and District of Columbia bars, as well as an inactive member in good standing of the California bar. He has not had any application for admission to practice denied, nor has he been sanctioned, cited for contempt, suspended, or disbarred from practice before any court or administrative body.

3. Mr. Gibbons has an established familiarity with the subject matter at issue in this proceeding. In particular, Mr. Gibbons has reviewed the subject U.S. Patent No. 12,156,781 (“781 patent”) (Ex. 1001), the relevant prosecution history (Ex. 1015), the Petition for Post-Grant Review (Paper 2), the prior-art references at issue (Exs. 1003–1006, 1008, 1026, 2012–2018), the Expert Declaration of John B. Brunski, Ph.D. (Ex. 1002), Patent Owner’s Request for Discretionary Denial (Paper 7), Petitioner’s Opposition Brief to Patent Owner’s Discretionary Denial

Request (Paper 9), Patent Owner's Preliminary Response (Paper 10), the Expert Declaration of Karl Leinsing (Ex. 2010), the Director's Referral Decision (Paper 11), the Board's Institution Decision (Paper 14), Petitioner's Objections to Evidence (Paper 19), and Patent Owner's Responses to Petitioner's Objections to Evidence (Paper 20).

4. Mr. Gibbons has also appeared as counsel for Patent Owner in the parallel litigation in the U.S. District Court for the District of Delaware, in which Patent Owner alleges Petitioner infringed the '781 patent. *See Smart Denture Conversions, LLC v. Straumann USA, LLC*, No. 1:24-cv-507-JCB (D. Del.).

5. Mr. Gibbons has also discussed the strategy, arguments, and evidence in this proceeding with the undersigned lead counsel, Kelsey I. Nix.

6. Simultaneously with this application in this proceeding, Mr. Gibbons has also applied for pro hac vice admission to appear in another proceeding by the same Petitioner against Patent Owner, IPR2025-00956, in which a trial has been instituted against claims of another patent in the same family as the '781 patent. Mr. Gibbons has discussed the strategy, arguments, and evidence in that related proceeding as well with the undersigned lead counsel, Kelsey I. Nix. Petitioner consents to the motion for pro hac vice admission in that proceeding.

7. In his declaration, Mr. Gibbons also attests to each of the listed items required by the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 5) at 3–4.

For the reasons stated above, Patent Owner submits that there is good cause for the Board to recognize John L. Gibbons pro hac vice during this proceeding.

Respectfully submitted,

Dated: February 5, 2026

By: /s/ Kelsey I. Nix
Kelsey I. Nix (Registration No. 33,119)
Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2026, I caused a true and correct copy of the foregoing Patent Owner’s Motion for Pro Hac Vice Admission of John L.

Gibbons to be served via email on Petitioner at the following addresses:

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Respectfully submitted,

Dated: February 5, 2026

By: /s/ Kelsey I. Nix
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