

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CENTRAL SQUARE TECHNOLOGIES, LLC,
Petitioner.

v.

CARBYNE, LTD.,
Patent Owner.

IPR2025-01179
U.S. Patent No. 11,689,383

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF DAN SINCLAIR**

TABLE OF EXHIBITS

Exhibit No.	Description
Exhibit 1001	U.S. Patent No. 11,689,383 to Dizengof (“the ’383 patent”)
Exhibit 1002	Prosecution History of U.S. Patent No. 11,689,383
Exhibit 1003	Declaration of Stuart J. Lipoff (“Lipoff”)
Exhibit 1004	CV of Stuart J. Lipoff
Exhibit 1005	U.S. Patent No. 9,762,733 to Ramanujaiaha et al. (“Ramanujaiaha”)
Exhibit 1006	U.S. Patent No. 9,420,099 to Krishnan et al. (“Krishnan”)
Exhibit 1007	Scott B. Guthery, Mary J. Cronin, <i>Mobile Application Development with SMS and the SIM toolkit</i> , McGraw-Hill (2002).
Exhibit 1008	Carbyne Answer to Complaint for Patent Infringement and Amended Counterclaims, <i>CentralSquare Technologies, LLC v. Carbyne, Inc. et al.</i> , Case No. 1:24-cv-01497-ADA, Dkt. 18 (W.D.Tex., June 16, 2025)
Exhibit 1009	U.S. Patent No. 9,792,654 to Limas et al.
Exhibit 1010	Declaration of Dan Sinclair in Support of Admission <i>Pro Hac Vice</i>

Petitioner CentralSquare Technologies, LLC (“CentralSquare”) hereby moves under 37 C.F.R. § 42.10(c) for the admission *pro hac vice* of Dan Sinclair in the present *inter partes* review.

I. INTRODUCTION AND BACKGROUND

Authorization for this motion was provided by PTAB in the Notice of Filing Date Accorded to Petition (Paper 3). Counsel for CentralSquare consulted with Counsel for Patent Owner Carbyne, Ltd. (“Carbyne”), and Carbyne agreed it does not oppose the present motion for *pro hac vice* admission for Mr. Sinclair. Therefore, the present motion is proper at this time. As explained further below, Mr. Sinclair is an experienced litigating attorney with established familiarity with the subject matter at issue in this *inter partes* review.

“[W]here the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” 37 C.F.R. § 42.10(c). A motion for *pro hac vice* admission must:

- a. Contain a statement of facts showing that there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding.
- b. Be accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:
 - i. Membership in good standing of the Bar of at least one State or the District of Columbia;

- ii. No suspensions or disbarments from practice before any court or administrative body;
- iii. No application for admission to practice before any court or administrative body ever denied;
- iv. No sanctions or contempt citations imposed by any court or administrative body;
- v. The individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the C.F.R.;
- vi. The individual 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);
- vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three (3) years; and
- viii. Familiarity with the subject matter at issue in the proceeding.

Unified Patents, Inc. v. Parallel Iron, LLC, Case No. IPR2013-00639, 2013 WL 8700556 (P.T.A.B. Oct. 15, 2013).

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE PRESENT MOTION

Based on the following facts, supported by their respective declaration, *see* Ex. 1010, CentralSquare requests that Mr. Sinclair be admitted *pro hac vice* in this proceeding. CentralSquare's lead counsel is a registered practitioner. (Paper No. 13 at 2).

A. Mr. Sinclair Meets the Requirements for Admission *Pro Hac Vice*

Mr. Sinclair has more than 6 years of experience as a litigation attorney specializing in patent litigation, representing clients in patent litigation matters in

various United States District Courts.

Mr. Sinclair is very familiar with U.S. Patent No. 11,689,383, and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner's Request for *Inter Prates* Review of U.S. Patent No. 11,689,383 which forms the basis for this proceeding. He is counsel for CentralSquare in the co-pending district court action related to this patent (*CentralSquare Technologies, LLC v. Carbyne, Inc. et al.*, Case No. 1:24-cv-01497, filed on December 4, 2024 in the Western District of Texas).

Mr. Sinclair is a member in good standing of the Bar of the State of Illinois. He is admitted to practice before the United States District Court for the Northern District of Illinois.

Mr. Sinclair has never been suspended or disbarred from practice before any court or administrative body.

Mr. Sinclair has never had a court or administrative body deny an application for admission to practice.

Mr. Sinclair has never been sanctioned or cited for contempt by any court or administrative body.

Mr. Sinclair has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

Mr. Sinclair agrees to be subject to the United States Patent and

Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

Mr. Sinclair has not previously sought admission *pro hac vice* before the Office. In the last three years, Mr. Sinclair has applied to appear *pro hac vice* in:

- *Artoff v. Polaris Industries, Inc.*, 1:22-cv-00514 (D. Or.)
- *Berlanga v. Polaris Industries Inc.*, 2:21-cv-00949 (E.D. Cal.)
- *Burbank v. Polaris Inc.*, 27-CV-20-8522 (Minn. Dist. Ct.)
- *Hellman v. Polaris Industries Inc.*, 2:23-cv-07187 (C.D. Cal.)
- *Lupin Atlantis Holdings, SA v. Xian-Ming Zeng*, 23-cv-61621 (S.D. Fla.)
- *Weber Food Tech. SE & Co. KG v. Provisur Techs.*, 1:25-cv-01333 (D. Del.)
- *CentralSquare Techs. LLC v. Carbyne Ltd.*, 1:24-cv-01497 (W.D. Tex.)

III. GOOD CAUSE EXISTS FOR THE *PRO HAC VICE* ADMISSION OF MR. SINCLAIR IN THIS PROCEEDING

The Board may recognize *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and any other conditions the Board may impose. 37 C.F.R. § 42.10(c). CentralSquare's lead counsel, Gianni L. Cutri (Reg. No. 52,791), is a registered practitioner before the Board. Based on the facts contained herein, good cause

exists to admit Mr. Sinclair *pro hac vice*.

Mr. Sinclair is an experienced litigator with more than 6 years of patent litigation experience. Mr. Sinclair has represented clients in matters related to computer systems and networked communications technologies, medical devices, home monitoring products and services, vehicle telematics, food processing equipment, and construction tools, and has significant experience in patent litigation matters. Mr. Sinclair is counsel for CentralSquare in the co-pending litigation on this same patent between the same parties and is actively involved with the strategy and fact development in the matter. In view of Mr. Sinclair's extensive knowledge of the subject matter of this proceeding, CentralSquare has a substantial need for Mr. Sinclair's *pro hac vice* admission and his involvement in the continued prosecution of this proceeding.

IV. CONCLUSION

For the foregoing reasons, CentralSquare respectfully requests that Dan Sinclair be admitted *pro hac vice*.

Dated: March 13, 2026

Respectfully submitted,

By: /s/ Gianni L. Cutri

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing
PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF DAN SINCLAIR and Exhibit 1010 were served on March 13,
2026 via email directed to counsel of record for the Patent Owner at the following:

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Dated: March 13, 2026

By: /s/ Vicki Merideth
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