

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORP.,
Petitioner,

v.

EMERGING AUTOMOTIVE LLC,
Patent Owner.

Case No. IPR2026-00070
U.S. Patent No. 12,337,716

**PETITIONER TOYOTA MOTOR CORPORATION'S MOTION FOR
PRO HAC VICE ADMISSION OF MICHAEL C. WILSON**

Petitioner Toyota Motor Corporation (“Petitioner” or “Toyota”) respectfully requests that the Patent Trial and Appeal Board (“Board”) recognize Michael C. Wilson, Esq. as *pro hac vice* and backup counsel for Petitioner in this proceeding.

I. BACKGROUND

Petitioner’s Motion for *Pro Hac Vice* Admission is being filed pursuant to and in compliance with the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, which was issued October 23, 2025 (Paper No. 3) (the “Notice”). The Notice authorizes parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c).

II. TIME OF FILING

This Motion for *Pro Hac Vice* admission is being filed in accordance with the Notice and the Order, and is being filed greater than 21 days after service of the Petition.

III. STATEMENT OF FACTS

As required by the Order, the following statement of facts, supported by the attached Declaration of Michael C. Wilson in Support of Motion for *Pro Hac Vice* Admission (Ex. 1019), shows that there is good cause for the Board to recognize Mr. Wilson *pro hac vice* in this proceeding.

As required by 37 C.F.R. § 42.10(c), Petitioner's lead counsel, Robert D. McCutcheon, is a registered practitioner experienced in proceedings before the USPTO.

Mr. Wilson is an experienced litigation attorney. Mr. Wilson has been a litigating attorney for more than 20 years and has been involved in numerous patent litigation cases in federal courts and matters before the Board.

Mr. Wilson's experience includes representing a wide range of clients in complex intellectual property litigation. In approximately the last three (3) years, Mr. Wilson has applied to appear, and was granted permission to appear, *pro hac vice* in IPR2022-00066 (see Paper No. 15), IPR2022-00067 (see Paper No. 14), and PGR2022-00030 (see Paper No. 13).

Mr. Wilson is a member in good standing of the Texas State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the 5th Circuit and the United States Court of Appeals for the Federal Circuit, as well as the United States District Courts for the Northern District of Texas, the Eastern District of Texas, the Western District of Texas, and the Southern District of Texas. His mailing address is at Munck Wilson Mandala, LLP, 2000 McKinney Avenue, Suite 1900, Dallas Texas, 75201. His email address and telephone number are mwilson@munckwilson.com, (972) 628-3600.

Mr. Wilson has worked with lead counsel in most aspects of his participation in this proceeding. As such, he has reviewed and is familiar with (i) U.S. Patent No. 12,337,716, the patent at issue in this proceeding, (ii) the prior art relied upon in the Petition, (iii) the legal and factual arguments that have been addressed by Petitioner, and (iv) the developments in this proceeding since the filing of the Petition. Accordingly, he has established familiarity with the subject matter at issue in these proceedings and the conduct of these proceedings to date.

Mr. Wilson 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 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§11.01 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. §11.19(a).

IV. CONCLUSION

Therefore, Petitioner respectfully submits that the facts contained in the Statement of Facts above, and contained in the Wilson Declaration (Ex. 1019), establish that there is good cause to admit Mr. Wilson *pro hac vice* in this proceeding as backup counsel under 37 C.F.R. § 42.10(c).

Dated: November 13, 2025

Respectfully submitted,

By: /Robert D. McCutcheon/
Robert D. McCutcheon
Registration No. 38,717

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that a copy of the foregoing PETITIONER’S MOTION FOR *PRO HAC VICE* ADMISSION OF MICHAEL C. WILSON and any accompanying exhibit was served on November 13, 2025 by electronic mail on the following counsel for Patent Owner¹:

Lead Counsel	Backup Counsel
Brenda Entzminger (Reg. No. 76,896) bentzminger@bdiplaw.com BDIP_EmergingAuto@bdiplaw.com Bunsow De Mory LLP 701 El Camino Real Redwood City, CA 94063 Telephone: 650-351-7248 Facsimile: 415-426-4744	Aaron R. Hand (Reg. No. 80,694) ahand@bdiplaw.com Bunsow De Mory LLP 701 El Camino Real Redwood City, CA 94063 Telephone: 650-351-7248 Facsimile: 415-426-4744

Dated: November 13, 2025

Respectfully submitted,

By: /Robert D. McCutcheon/
Robert D. McCutcheon
Registration No. 38,717

¹ Patent Owner identified this lead and backup counsel contact information in Patent Owner’s Mandatory Notice Information filed on November 3, 2025.