

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

CONOPCO, INC. dba UNILEVER  
Petitioner

v.

THE PROCTOR & GAMBLE COMPANY  
Patent Owner

---

Case No. IPR2013-00509  
Patent 6,451,300

---

**PETITIONER MOTION TO WITHDRAW COUNSEL AND  
SUBSTITUTE NEW COUNSEL**

**I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(e), and as authorized by the Board via an email dated May 30, 2014 (*see* 37 C.F.R. § 42.20(b)), counsel for Petitioner, Conopco, Inc. *dba* Unilever Corp., respectfully requests authorization to withdraw as counsel for Petitioner in this *inter partes* review proceeding. Petitioner is concurrently filing Motions to Withdraw and Substitute New Counsel in related proceedings IPR2013-00510, IPR2014-00628, IPR2014-00507, IPR2013-00505, and IPR2014-00506.

**II. STATEMENT OF REASONS FOR SUBSTITUTION OF COUNSEL**

Petitioner wishes for new counsel, Joseph P. Meara, Ph.D., Esq. (Registration No. 44,932) and Michael R. Houston, Ph.D., Esq. (Registration No. 58,486), to be designated as lead and back-up counsel, respectively, and represent Petitioner going forward in this proceeding. Petitioner's new counsel meet the requirements of 37 C.F.R. § 42.10(c) as registered practitioners.

No extensions of time are sought with this Motion. It is believed that granting this Motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. *See* 35 U.S.C § 316(b); *see also* Case IPR2013-00010, Paper 30.

As required by 37 C.F.R. § 42.10(b), an executed Power of Attorney is filed concurrently herewith. Upon grant of this Motion, Petitioner will promptly file an Updated Mandatory Notice Under 37 C.F.R. § 42.8(b)(3).

Counsel for Patent Owner was contacted prior to seeking authorization to file this Motion. Patent Owner does not object to the withdrawal of current counsel or to the substitution of new counsel.

### **III. CONCLUSION**

For the foregoing reasons, Petitioner and withdrawing counsel respectfully request that this Motion be granted.

Respectfully submitted,

Date: 6/5/2014

By: /Eldora L. Ellison/  
Eldora L. Ellison (Reg. No. 39,967)  
Robert G. Sterne (Reg. No. 28,912)  
Sterne, Kessler, Goldstein & Fox  
P.L.L.C.  
1100 New York Avenue, NW  
Washington, DC 20005  
Telephone (202) 371-2600  
Facsimile (202) 371-2540  
[ellison-PTAB@skgf.com](mailto:ellison-PTAB@skgf.com)  
[rsterne-PTAB@skgf.com](mailto:rsterne-PTAB@skgf.com)

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PATENT OWNER MOTION TO WITHDRAW COUNSEL AND SUBSTITUTE NEW COUNSEL** and the concurrently filed **POWER OF ATTORNEY** is being served by electronic mail this 5<sup>th</sup> day of June, 2014 on counsel for Patent Owner as follows:

David M. Maiorana  
John V. Biernacki  
Michael S. Weinstein  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone (216) 586-3939  
Facsimile (216) 579-0212  
[dmaiorana@jonesday.com](mailto:dmaiorana@jonesday.com)  
[jvbiernacki@jonesday.com](mailto:jvbiernacki@jonesday.com)  
[msweinstein@jonesday.com](mailto:msweinstein@jonesday.com)

Steven W. Miller  
Kim W. Zerby  
Carl J. Roof  
Angela K. Haughey  
THE PROCTOR &  
GAMBLE COMPANY  
299 E. Sixth Street  
Cincinnati, Ohio 45202  
Telephone (513) 983-1246  
Facsimile (513) 945-2729  
[miller.sw@pg.com](mailto:miller.sw@pg.com)  
[zerby.kw@pg.com](mailto:zerby.kw@pg.com)  
[roof.cj@pg.com](mailto:roof.cj@pg.com)  
[haughey.a@pg.com](mailto:haughey.a@pg.com)

Date: 6/5/2014

By: /Eldora L. Ellison/  
Eldora L. Ellison (Reg. No. 39,967)  
Robert G. Sterne (Reg. No. 28,912)  
Sterne, Kessler, Goldstein & Fox  
P.L.L.C.  
1100 New York Avenue, NW  
Washington, DC 20005  
Telephone (202) 371-2600  
Facsimile (202) 371-2540  
[ellison-PTAB@skgf.com](mailto:ellison-PTAB@skgf.com)  
[rsterne-PTAB@skgf.com](mailto:rsterne-PTAB@skgf.com)

*Counsel for Petitioner*