

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOYOTA MOTOR NORTH AMERICA, INC., SUBARU OF AMERICA, INC.,  
AMERICAN HONDA MOTOR CO., INC., NISSAN NORTH AMERICA, INC.,  
FORD MOTOR COMPANY, JAGUAR LAND ROVER NORTH AMERICA,  
LLC, AND VOLVO CARS OF NORTH AMERICA, LLC,  
Petitioner

v.

CRUISE CONTROL TECHNOLOGIES LLC  
Patent Owner

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Case No. IPR2014-00281  
Patent No. 6,324,463

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**PETITIONER FORD MOTOR COMPANY'S MOTION FOR COUNSEL  
TO WITHDRAW AND PERMIT SUBSTITUTION OF NEW COUNSEL**

**I. STATEMENT OF PRECISE RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10, and as authorized by the Board via e-mail on December 19, 2014, Petitioner Ford Motor Company (“Ford”) respectfully requests that the Patent Trial and Appeal Board (“the Board”) authorize withdrawal of its current counsel, Matthew J. Moore and Michael B. Eisenberg, and substitution of new counsel Eric A. Buresh and Jason R. Mudd. Mr. Moore should remain listed as back-up counsel in this petition as counsel for Jaguar Land Rover North America, LLC.

**II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL OF COUNSEL**

Matthew J. Moore and Michael B. Eisenberg were appointed by Ford as its attorneys for the above-captioned inter partes review. Petitioner Ford now requests that current designated counsel be allowed to withdraw from the present proceeding, and that new counsel listed below be substituted to represent Ford in this proceeding.

<b>Lead Counsel</b>	<b>Back-Up Counsel</b>
Eric A. Buresh (Reg. No. 50,394) eric.buresh@eriseip.com	Jason R. Mudd (Reg. No. 57,700) jason.mudd@eriseip.com
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<i>Counsel for Ford Motor Company</i>	<i>Counsel for Ford Motor Company</i>

Mr. Buresh and Mr. Mudd meet the requirements of 37 C.F.R. § 42.10 as lead and back-up counsel and are both registered practitioners. In addition, Mr. Buresh and Mr. Mudd have read and intend to comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of the C.F.R.

No extensions of time are sought with this Motion and granting this Motion will not cause delay in the proceeding or any prejudice to Patent Owner.

As required by 37 C.F.R. §42.10(b), an executed Power of Attorney is filed concurrently. Upon grant of this Motion, Petitioner will promptly file an Updated Mandatory Notice under 37 C.F.R § 42.8(b)(3) and (b)(4) identifying the new counsel.

Counsel for Patent Owner was consulted and has no objections to appointment of Mr. Buresh and Mr. Mudd as new lead and back-up counsel, respectively.

### **III. CONCLUSION**

Accordingly, Petitioner Ford respectfully requests that the Board grant its motion to authorize withdrawal of counsel.

Dated: January 5, 2015

Respectfully submitted,

By: /s/Matthew J. Moore  
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***Counsel for Petitioner Ford Motor  
Company***

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the attached PETITIONER FORD MOTOR COMPANY'S MOTION FOR COUNSEL TO WITHDRAW AND PERMIT SUBSTITUTION OF NEW COUNSEL was sent via electronic mail on January 5, 2015, to the following:

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