

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

INTEL CORPORATION  
Petitioner

v.

ZOND, LLC  
Patent Owner

U.S. Patent No. 7,147,759

---

*Inter Partes* Review Case No. 2014-00446

---

**PATENT OWNER'S MOTION FOR COUNSEL TO  
WITHDRAW FROM THE PROCEEDING AND PERMIT  
SUBSTITUTION OF COUNSEL**

**I. STATEMENT OF PRECISE RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10, Patent Owner Zond, LLC (“Zond”) respectfully requests that the Patent Trial and Appeal Board (“the Board”) authorize withdrawal of its current counsel, Dr. David C. Radulescu and Dr. Kurt Rauschenbach, and substitution of new counsel Dr. Gregory J. Gonsalves and Bruce J. Barker.

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

Dr. David C. Radulescu and Dr. Kurt Rauschenbach were appointed by Zond as its attorneys for the above-captioned inter partes review. Patent Owner Zond now requests that current designated counsel be allowed to withdraw from the present proceeding, and that new counsel listed below be substituted to represent Zond in this proceeding.

Lead Counsel:

Dr. Gregory J. Gonsalves  
Reg. No. 43,639  
2216 Beacon Lane  
Falls Church, Virginia 22043  
(571) 419-7252  
[gonsalves@gonsalveslawfirm.com](mailto:gonsalves@gonsalveslawfirm.com)

Back-up Counsel:

Bruce Barker  
Reg. No. 33,291

Chao Hadidi Stark & Barker LLP  
176 East Main Street, Suite 6  
Westborough, MA 01581  
(508) 366-3800  
[bbarker@chsblaw.com](mailto:bbarker@chsblaw.com)

Dr. Gregory Gonsalves meets the requirements of 37 C.F.R. § 42.10(c) as lead counsel and is a registered practitioner. In addition Dr. Gonsalves and Mr. Barker 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.

Counsel for Petitioner has no objections to appointment of Dr. Gregory Gonsalves as new lead counsel.

Accordingly, Patent Owner Zond respectfully requests that the Board grant its motion to authorize withdrawal of counsel. Also filed concurrently with this motion is an amended Mandatory Notice and new Power of Attorney submission reflecting the new counsel representing Zond.

Date: April 16, 2014

Respectfully submitted,

/David C. Radulescu/

David C. Radulescu  
Registration No. 36,250

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Motion For Counsel To Withdraw From The Proceeding and Permit Substitution Of Counsel and the associated Power of Attorney documents were served via email on April 16, 2014, on the attorneys for the Petitioner:

Richard Goldenberg, Reg. No. 38,895  
David L. Cavanaugh, Reg. No. 36,476  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Ave., NW  
Washington, DC 20006  
Tel: (202) 663-6000  
Email: Richard.Goldenberg@wilmerhale.com  
David.Cavanaugh@wilmerhale.com

/David C. Radulescu/  
David C. Radulescu  
Registration No. 36,250