

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. 7,811,421

Inter Partes Review Case No. 2014-00473

**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:

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

Back-up Counsel:

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

Mr. Barker meets the requirements of 37 C.F.R. § 42.10(c) as lead counsel and is a registered practitioner. In addition Mr. Barker and Dr. Gonsalves 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 Mr. Barker 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 21, 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 21, 2014, on the attorneys for the Petitioner:

Richard Goldenberg, Reg. No. 38,895
Yung-Hoon Ha, Reg. No. 56,368
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Ave., NW
Washington, DC 20006
Tel: (202) 663-6000
Email: Richard.Goldenberg@wilmerhale.com
Yung-Hoon.Ha@wilmerhale.com

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