

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHONGSHAN BROAD OCEAN MOTOR CO., LTD.
Petitioner

v.

NIDEC MOTOR CORPORATION
Patent Owner

Case IPR2014-01121
Patent 7,626,349

**ZHONGSHAN BROAD OCEAN MOTOR CO.,
LTD.'S MOTION FOR COUNSEL TO WITHDRAW
FROM THE PROCEEDING TO PERMIT
SUBSTITUTION OF COUNSEL**

Mail Stop Patent Board
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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Statement of Relief Requested

Pursuant to 37 C.F.R. § 42.10(e) and the Board's authorization on September 16, 2014 to file a motion to withdraw, Petitioner Zhongshan Broad Ocean Motor Co., Ltd. ("Petitioner") respectfully requests authorization to withdraw its current counsel from the present proceeding, thereby allowing Petitioner's proposed new counsel to promptly substitute in as counsel of record in this proceeding.

This motion is unopposed by Patent Owner.

Statement of Facts

Petitioner requests that current designated counsel, Nathan J. Rees and Daniel A. Prati of Fulbright & Jaworski L.L.P., withdraw from the present proceeding. Petitioner's new counsel from Locke Lord L.L.P. will submit a new power of attorney and updated disclosures "substantially concurrently" to this motion as required by the Board in its authorization.

Petitioner is not proposing any schedule change as a result of the substitution. This substitution of counsel will not cause any delay in the proceeding or any prejudice to Patent Owner.

In view of the above, Petitioner respectfully requests that the Board grant this motion for withdrawal of Petitioner's current counsel

Dated: October 3, 2014

Respectfully submitted,



Nathan J. Rees (Reg. No. 63,820)
Daniel A. Prati (Reg. No. 65,869)
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Certificate of Service

Pursuant to 37 C.F.R. § 42.8(e) and 37 C.F.R. § 42.105(b), the undersigned certifies that on October 3, 2014, a copy of Zhongshan Broad Ocean Motor Co., Ltd.'s Motion for Counsel to Withdraw from the Proceeding to Permit Substitution of Counsel was electronically served on the Patent Owner of record at sbrown@hoveywilliams.com, mwalters@hoveywilliams.com, and litigation@hoveywilliams.com, as agreed upon by the parties.

Additionally, the undersigned certifies that on October 3, 2014, a copy of Zhongshan Broad Ocean Motor Co., Ltd.'s Motion for Counsel to Withdraw from the Proceeding to Permit Substitution of Counsel was electronically served on the Patent Owner's below-listed counsel of record at jschwent@thompsoncoburn.com, djinkins@thompsoncoburn.com, and syoo@thomponsoburn.com, in the co-pending litigation *Nidec Motor Corporation v. Broad Ocean Motor LLC et al.*, Civil Action No. 4:13-CV-01895-JCH (E. D. Mo.) as agreed upon by the parties.

Respectfully submitted,



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