UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC. Petitioner

v.

DRAGON INTELLECTUAL PROPERTY, LLC Patent Owner

Case IPR2014-01252 Patent 5,930,444

Before GREGG I. ANDERSON, STACEY G. WHITE, and J. JOHN LEE, *Administrative Patent Judges*.

WHITE, Administrative Patent Judge.

DOCKET

MOTION TO WITHDRAW AS COUNSEL PURSUANT TO 37 C.R.F. 42.10(E)

I. Statement of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10 and authorization provided by the Patent Trial and Appeal Board ("the Board") on November 10, 2015, Patent Owner Dragon Intellectual Property, LLC ("Dragon") respectfully requests that the Board authorize withdrawal of its current counsel Jason S. Angell and Robert E. Freitas of Freitas Angell & Weinberg LLP.

II. Statement of Facts Showing Good Cause for the Board to Authorize Withdrawal of Counsel

On August 26, 2015, Patent Owner Dragon appointed Jason S. Angell and

Robert E. Freitas as its attorneys in the above-captioned *inter partes* review.

Patent Owner Dragon requests that current designated counsel, Jason S. Angell and

Robert E. Freitas, be allowed to withdraw from the present proceeding, and new

counsel, Kai Zhu, be designated lead counsel to represent Dragon in this

proceeding. Dragon intends to appoint new counsel as follows:

RM

Kai Zhu (Reg. No. 64,586) 60 Cody Ln Los Altos, CA 94022 Telephone: (650) 999-0172 Facsimile: (928) 569-1639 kz@dragonipllc.com

New counsel meets the requirements of 37 C.F.R. § 42.10(c) as lead counsel and is a registered practitioner. In addition Dragon's proposed lead counsel has read and intends 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. Dragon has advised the Board that the withdrawal and change in lead counsel will not affect the orderly progress of this proceeding.

Patent Owner Dragon respectfully requests that the Board grant its motion to authorize withdrawal of counsel. Upon grant of this motion, current counsel for Dragon will promptly file an updated mandatory notice. Dragon has herewith filed a new Power of Attorney for Mr. Zhu.

Dated: November 11, 2015

By:/*s/Jason S. Angell* Jason S. Angell Reg. No. 51408

CERTIFICATE OF SERVICE

It is certified that a copy of the foregoing has been served on Petitioner via

electronic mail transmission addressed to the person(s) at the address below:

Michael L. Kiklis (Reg. No. 38,939) Scott McKeown (Reg. No. 42,866) Katherine D. Cappaert (Reg. No. 71,639) OBLON, MCCLELLAND, MAIER & NEUSTADT, L.L.P. cpdocketKiklis@oblon.com cpdocketMcKeown@oblon.com cpdocketCappaert@oblon.com

> Jonathan Stroud jonathan@unifiedpatents.com

Date: November 11, 2015

/s/Jason S. Angell

Jason S. Angell Reg. No. 51408