

Case No. IPR2015-00209

Patent No. 6,108,704

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC., *et al.*

Petitioners

v.

STRAIGHT PATH IP GROUP, INC.

(FORMERLY KNOWN AS INNOVATIVE COMMUNICATIONS
TECHNOLOGIES, INC.)

Patent Owner

Case No. IPR2015-00209

Patent No. 6,108,704

**PETITIONER HULU, LLC'S UNOPPOSED MOTION FOR
COUNSEL TO WITHDRAW AND PERMIT SUBSTITUTION OF
COUNSEL**

I. STATEMENT OF RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(e) and the Board's December 1, 2014 Order authorizing this motion (Paper 6), Petitioner Hulu, LLC ("Hulu") respectfully requests that the Patent Trial and Appeal Board authorize withdrawal of its current lead counsel, Stacy S. Chen, and substitute in Leo L. Lam.

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

On October 31, 2014, Hulu appointed Stacy S. Chen as its lead counsel in the above-captioned *inter partes* review. On November 21, 2014, Ms. Chen left the law firm of Kecker & Van Nest LLP. Hulu therefore requests that Ms. Chen be permitted to withdraw from the current proceeding and that Leo L. Lam of Kecker & Van Nest LLP be designated lead counsel to represent Hulu in this proceeding.

Mr. Lam meets the requirements of 37 C.F.R. § 42.10(c) to serve as lead counsel as a registered practitioner. Hulu's designated back-up counsel shall remain the same. A Substitute Power of Attorney and Amended Mandatory Notices for Hulu's new counsel accompany this motion. Hulu confirms that there will be no changes to the schedule based on the change in counsel.

Counsel for Patent Owner Straight Path IP Group, Inc., has no objection to the withdrawal of Ms. Chen and the appointment of Mr. Lam as new lead counsel.

III. REASONS FOR RELIEF REQUESTED

“Counsel may not withdraw from a proceeding before the Board unless the Board authorizes such withdrawal.” 37 C.F.R. § 42.10(e). Given Ms. Chen’s change of employer and Hulu’s corresponding change in its desired counsel, it is appropriate to withdraw Ms. Chen as counsel and allow Mr. Lam to represent Hulu. Although motions to withdraw are typically filed by the withdrawing attorney, Ms. Chen has already left Keker & Van Nest LLP and is no longer involved in this action, and so Mr. Lam instead files this motion. *See Norwex USA, Inc., et al. v. UMF Corp., et al.*, IPR2014-00151, slip op. at 3 (PTAB June 5, 2014) (Paper 17) (recognizing that “circumstances may not always permit withdrawing counsel to file the motion”). Moreover, the administrative requirements for a motion to withdraw have been satisfied by the accompanying Substitute Power of Attorney and Amended Mandatory Notices. Patent Owner and Petitioners LG Electronics, Inc., Toshiba Corp., and VIZIO, Inc. do not oppose this motion.

IV. CONCLUSION

Petitioner Hulu respectfully requests that the Board grant its motion to authorize the withdrawal of Ms. Chen and permit substitution of Mr. Lam as lead counsel.

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Respectfully submitted,

DATED: December 3, 2014

/s/ Leo L. Lam

Leo L. Lam

Registration No. 38,528

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petitioner Hulu, LLC's Motion for Counsel to Withdraw and Permit Substitution of Counsel**, together with all exhibits and other papers filed therewith were served on December 3, 2014 by placing a copy into FEDERAL EXPRESS directed to the attorneys of record for the patent at the following address:

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