

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC.  
Petitioner

v.

ATI TECHNOLOGIES ULC  
Patent Owner

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Case IPR2015-00321  
Patent 7,095,945

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**PATENT OWNER'S MOTION TO WITHDRAW AS COUNSEL AND  
SUBSTITUTE NEW COUNSEL**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

## **I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(e), and as authorized by the Board in its Order dated March 16, 2015 (see 37 C.F.R. § 42.20(b)), counsel for Patent Owner respectfully requests authorization to withdraw as counsel for Patent Owner in this *inter partes* review proceeding in favor of appointment of new counsel for Patent Owner. Withdrawing counsel includes Cyrus A. Morton (lead counsel), J. Scott Culpepper (back-up counsel), Aaron R. Fahrenkrog (*pro hac vice*) and William H. Manning (*pro hac vice*).

The undersigned lead counsel for Patent Owner has conferred with Petitioner's counsel, who has stated that Petitioner will not oppose the present motion.

## **II. STATEMENT OF REASONS FOR SUBSTITUTION OF COUNSEL**

Patent Owner wishes for new counsel, Michael B. Ray (Registration No. 33,997), Lestin Kenton (Registration No. 72,314) and Michael D. Specht (Registration No. 54,463) of Sterne, Kessler, Goldstein & Fox, P.L.L.C., to be designated as lead and back-up counsel, respectively, and represent Patent Owner going forward in this proceeding. Patent Owner's new counsel meet the requirements of 37 C.F.R. § 42.10(c) as registered practitioners.

A decision on whether to institute this *inter partes* review has not yet issued, and no extensions of time will be needed upon grant of this Motion. Furthermore,

it is believed that granting this Motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. See 35 U.S.C. § 316(b).

An executed updated Power of Attorney is being filed concurrently.

Updated Mandatory Notices Under 37 C.F.R. §42.8(b)(3) and (b)(4) will be filed upon grant of the present motion.

Date: March 17, 2015

Respectfully submitted,

/ Cyrus A. Morton /

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Attorney for Patent Owner

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 17, 2015, the foregoing  
**MOTION TO WITHDRAW AS COUNSEL AND SUBSTITUTE NEW  
COUNSEL** was served electronically via e-mail in its entirety on the following  
counsel of record for Petitioner:

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