

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DISH NETWORK L.L.C.,

Petitioner,

v.

DRAGON INTELLECTUAL PROPERTY, LLC,

Patent Owner.

Case IPR2015-00499

Patent 5,930,444

**PETITIONER'S RESPONSE TO PATENT OWNER'S MOTION
FOR COUNSEL TO WITHDRAW**

On November 3, 2015, Patent Owner Dragon filed a Motion for Counsel to Withdraw from the Proceeding and Permit Substitution of Counsel (“Motion”) requesting that Dragon’s 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.

Contingent upon Dragon promptly (by Tuesday, November 10) providing a range of dates on which DISH Network L.L.C. (“DISH”) can depose Dragon’s expert – Adam Goldberg – DISH does not oppose the pending Motion.

DISH expressly reserves and does not waive its right to pursue attorneys’ fees and costs from either Mr. Angell or Mr. Freitas in the co-pending District Court action (*Dragon Intellectual Property, LLC v. DISH Network L.L.C.*, No. 13-2066-RGA (D. Del.)), including any attorneys’ fees and costs related to this IPR.

Respectfully submitted,

Dated: November 6, 2015

/Eliot D. Williams/

Eliot D. Williams (Reg. No. 50,822)
G. Hopkins Guy III (Reg. No. 35,866)
1001 Page Mill Road, Bld. 1, Suite 200
Palo Alto, California 94304-1007
650.739.7510

*Attorneys for Petitioner
DISH Network L.L.C.*

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 6th day of November, 2015, a complete and entire copy of the foregoing **PETITIONER'S RESPONSE TO PATENT OWNER'S MOTION FOR COUNSEL TO WITHDRAW**, including exhibits and testimony relied upon, were served on the Patent Owner electronically at the email addresses below:

Jason Angell
Freitas Angell & Weinberg LLP
350 Marine Parkway, Suite 200
Redwood Shores, CA 94065
jangel@fawlaw.com

Robert E. Freitas
Freitas Angell & Weinberg LLP
350 Marine Parkway, Suite 200
Redwood Shores, CA 94065
rfreitas@fawlaw.com

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

Dated: November 6, 2015

/Eliot D. Williams/
Eliot D. Williams (Reg. No. 50,822)
G. Hopkins Guy III (Reg. No. 35,866)
1001 Page Mill Road, Bld. 1, Suite 200
Palo Alto, California 94304-1007
650.739.7510

*Attorneys for Petitioner
DISH Network L.L.C.*