

Filed On behalf of:

INO Therapeutics LLC

By:

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Praxair Distribution, Inc.
Petitioner,
v.
INO Therapeutics LLC
Patent Owner.

Case IPR2015-00891
U.S. Patent No. 8,573,210

**PATENT OWNER INO THERAPEUTICS LLC'S MOTION FOR
COUNSEL TO WITHDRAW AND PERMIT
SUBSTITUTION OF NEW COUNSEL**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, and as authorized by the Board on October 28, 2015, Patent Owner INO Therapeutics LLC's ("INOT") respectfully requests that the Patent Trial and Appeal Board ("the Board") authorize withdrawal of its current counsel, Dominick A. Conde, Edmund J. Haughey, and William E. Solander, and authorize substitution of new counsel Robert Steinberg and Daniel Brown.

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

Dominick A. Conde, Edmund J. Haughey, and William E. Solander were appointed by INOT as its attorneys for the above-captioned *inter partes* review. Patent Owner INOT now requests that current designated counsel be allowed to withdraw from the present proceeding, and that new counsel listed below be substituted to represent INOT in this proceeding.

Lead Counsel	Back-Up Counsel
Robert Steinberg (Reg. No. 33,144)	Daniel Brown (Reg. No. 54,005)
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<i>Counsel for INO Therapeutics LLC</i>	<i>Counsel for INO Therapeutics LLC</i>

Mr. Steinberg and Mr. Brown meet the requirements of 37 C.F.R. § 42.10 as lead and back-up counsel and are both registered practitioners. In addition, Mr. Steinberg and Mr. Brown have read and intend 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.

No extensions of time are sought with this Motion and granting this Motion will not cause delay in the proceeding or any prejudice to Petitioner.

As required by 37 C.F.R. §42.10(b), an executed Power of Attorney is filed concurrently as Exhibit 2007. Upon grant of this Motion, Patent Owner will promptly file an Updated Mandatory Notice under 37 C.F.R § 42.8(b)(3) and (b)(4) identifying the new counsel.

Counsel for Petitioner was consulted and has no objections to appointment of Mr. Steinberg and Mr. Brown as new lead and back-up counsel, respectively.

III. CONCLUSION

Accordingly, Patent Owner INO Therapeutics LLC respectfully requests that the Board grant its motion to authorize withdrawal of counsel.

October 29, 2015

Respectfully submitted,

/Dominick A. Conde/

Dominick A. Conde (Reg. No. 33,856)
Lead Counsel for Patent Owner
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INO Therapeutics LLC*

Back-up Counsel:

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CERTIFICATE OF SERVICE

I certify that a copy of the Patent Owner INO Therapeutics LLC's Motion for Counsel to Withdraw and Permit Substitution of New Counsel was served on October 29, 2015 by causing it to be sent by email to counsel for Petitioner at the following email addresses:

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October 29, 2015

Respectfully submitted,

/Dominick A. Conde/

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