Paper	
	UNITED STATES PATENT AND TRADEMARK OFFICE
	BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., MOTOROLA MOBILITY LLC, and TOSHIBA AMERICA INFORMATION SYSTEMS, INC., *Petitioners* 

v.

GLOBAL TOUCH SOLUTIONS, LLC
Patent Owner

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Case IPR2015-01173 Patent 7,329,970 B2

PATENT OWNER'S UNOPPOSED MOTION FOR COUNSEL TO WITHDRAW

Patent Owner Global Touch Solutions, LLC ("PO" herein) respectfully moves for withdrawal of its back-up counsel, Steven B. Kelber ("Kelber" herein), as counsel for PO in the above-captioned matter, pursuant to 37 C.F.R. §41.5(c).

## STATEMENT OF MATERIAL FACTS AND RELIEF REQUESTED

As provided for in 37 C.F.R. §11.116(a)(3), withdrawal is required because the client, PO, has discharged Kelber and terminated its engagement with Kelber.

Pursuant to the provisions of 37 C.F.R. §11.116(b)(1), withdrawal can be accomplished without material adverse effect – competent replacement counsel was designated as Lead Counsel on August 1, 2016, in Patent Owner's Updated Mandatory Notices (Paper 48).

Pursuant to 37 C.F.R. §11.116(c), PO requested permission from the Board to file this motion for counsel to withdraw on July 20, 2016, and on July 27, 2016, via email. The Board granted permission on July 28, 2016, via email.

With respect to the requirements of 37 C.F.R. §11.116(d), Kelber has conferred with PO, and PO agrees that under the circumstances, withdrawal is appropriate and will not injure PO's interests. Other counsel has been notified.

Petitioners have indicated that they have no opposition to this motion.

Therefore, PO respectfully requests that Kelber be withdrawn from further action in this matter.



Date: August 2, 2016 Respectfully submitted,

/William H. Mandir/

William H. Mandir Reg. No. 32,156 wmandir@sughrue.com

Counsel for Patent Owner



## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 2nd Day of August, 2016, the foregoing PATENT OWNER'S UNOPPOSED MOTION FOR COUNSEL TO WITHDRAW, was served by e-mail on counsel for Petitioner:

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