

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIRIUS XM RADIO INC.,
Petitioner,

v.

DRAGON INTELLECTUAL PROPERTY, LLC,
Patent Owner

No. IPR2015-01735
U.S. Patent No. 5,930,444

**MOTION TO WITHDRAW AS COUNSEL
PURSUANT TO 37 C.R.F. 42.10(E)**

I. Statement of Precise Relief Requested.

Pursuant to 37 C.F.R. § 42.10 and authorization provided by the Patent Trial and Appeal Board (“the Board”) on November 10, 2015, Patent Owner Dragon Intellectual Property, LLC (“Dragon”) respectfully requests that the Board authorize withdrawal of its current counsel Jason S. Angell and Robert E. Freitas of Freitas Angell & Weinberg LLP.

II. Statement of Facts Showing Good Cause for the Board to Authorize Withdrawal of Counsel.

On August 25, Patent Owner Dragon appointed Jason S. Angell and Robert E. Freitas as its attorneys in the above-captioned *inter partes* review. Patent Owner Dragon requests that current 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. Dragon intends to appoint new counsel as follows:

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

New counsel meets the requirements of 37 C.F.R. § 42.10(c) as lead counsel and is a registered practitioner. In addition Dragon’s proposed lead counsel has read and intends 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. Dragon has advised the Board that the withdrawal and change in lead counsel will not affect the orderly progress of this proceeding.

Patent Owner Dragon respectfully requests that the Board grant its motion to authorize withdrawal of counsel. Upon grant of this motion, current counsel for Dragon will promptly file an updated mandatory notice. Dragon has herewith filed a new Power of Attorney for Mr. Zhu.

Dated: November 11, 2015

By: /s/ Jason S. Angell
Jason S. Angell
Reg. No. 51408

CERTIFICATE OF SERVICE

It is certified that a copy of the foregoing Power of Attorney has been served on Petitioner via electronic mail transmission addressed to the persons at the addresses below:

Jonathan S. Caplan (Reg. No. 38,094)
James Hannah (Reg. No. 56,369)
Mark A. Baghdassarian
KRAMER LEVIN NAFTALIS & FRANKEL LLP
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jhannah@kramerlevin.com
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Dated: November 11, 2015

By: /s/ Jason S. Angell
Jason S. Angell
Reg. No. 51408