

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

UNITED SERVICES AUTOMOBILE ASSOCIATION,

Petitioner

v.

NADER ASGHARI-KAMRANI and KAMRAN ASGHARI-KAMRANI,

Patent Owners

U.S. PATENT NO. 8,266,432

Case IPR2015-01842

MOTION FOR WITHDRAWAL BY COUNSEL

I. 37 C.F.R. §42.10 – STATEMENT OF RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, present Counsel for Patent Owners, Jae Youn Kim, Harold L. Novick, and Sang Ho Lee at Novick, Kim & Lee, PLLC, respectfully request that the Board authorize their withdrawal as counsel for Patent Owners pursuant to 37 C.F.R. §41.5(c) and §11.116(a)(3). Counsel has been advised that Patent Owners have selected new counsel Reece Nienstadt at Mei & Mark LLP as lead counsel, and Krystyna Colantoni, and Lei Mei at Mei & Mark LLP as backup counsel in this matter.

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

On September 23, 2015, Patent Owners submitted their Mandatory Notice Under 37 C.F.R. §§ 42.8(a)(2), appointing Jae Youn Kim, Harold L. Novick, and Sang Ho Lee at Novick, Kim & Lee, PLLC as their counsel in the above-captioned *inter partes* review. Patent Owners now desire that the originally designated counsel be withdrawn from the present proceeding, and their new counsel, Reece Nienstadt, Krystyna Colantoni, and Lei Mei, be designated as counsel to represent Patent Owners in this proceeding.

This case is presently in a quiescent state since Patent Owners filed a Preliminary Response pursuant to 35 U.S.C. 313 and 37 C.F.R. §42.107 on December 10, 2015 and the decision on the institution of a Post Grant Review is now pending before the Board.

It is submitted that reasonable steps have been taken by the original counsel for the Patent Owners such that withdrawal can be accomplished without material adverse effect on the interests of the Patent Owners. Further, 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).

III. THE BOARD HAS AUTHORIZED THIS WITHDRAWAL

On January 12, 2016, the Board has authorized counsel for patent owners to file a Motion to Withdraw as counsel and substitute new counsel.

IV. CONCLUSION

Accordingly, counsel for Patent Owners respectfully requests that the Board grant this motion of withdrawal of counsel and permit substitution of counsel. Upon the granting of this motion, it is believed that new counsel for Patent Owners will promptly file Amended Patent Owner's Mandatory Notices and a Substitute Power of Attorney.

Respectfully submitted,

January 13, 2016

By: /Jae Youn Kim /
Jae Youn Kim, Reg. No. 69,215
Lead Counsel
Novick, Kim & Lee, PLLC
1604 Spring Hill Rd. Suite 320
Vienna, VA 22182
Telephone: 703-546-8554

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **MOTION FOR WITHDRAWAL BY COUNSEL** is being served on January 13, 2016 via email on the following:

Counsel for Petitioner:

Michael Zoppo, Lead Counsel
zoppo@fr.com

Thomas Rozylowicz, Back-up Counsel
Ipr36137-0007ip1@fr.com

Patent Owners:

Nader Asghari-Kamrani and Kamran Asghari-Kamrani
kamrani@delphinustechnology.com.

Respectfully submitted,

By: /Sang Ho Lee/

Sang Ho Lee
Reg. No. 69,723