

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMPLEX INNOVATIONS, LLC,
Petitioner,

v.

ASTRAZENECA AB,
Patent Owner.

Case No. IPR2017-00631
Patent No. 7,759,328

**PATENT OWNER'S MOTION FOR
WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

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

Pursuant to 37 C.F.R. § 42.10(e), and the Board's authorization dated March 20, 2017, Patent Owner AstraZeneca AB respectfully requests that the Board authorize withdrawal of Jeffrey P. Kushan and Paul J. Zegger of Sidley Austin LLP as lead and backup lead counsel, and to designate Christopher N. Sipes and Andrea G. Reister of Covington & Burling LLP ("Covington") as lead and backup lead counsel, respectively.

II. STATEMENT SHOWING GOOD CAUSE FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL

On January 9, 2017, Petitioner Complex Innovations, LLC filed a petition in this proceeding. The Board accorded the petition a filing date of January 9, 2017 in Paper No. 22, dated January 26, 2017.

On January 24, 2017, Patent Owner filed its mandatory notices in response to the Petition. In that paper, Patent Owner appointed Jeffrey P. Kushan and Paul J. Zegger of Sidley Austin LLP as lead and back-up counsel in this proceeding.

Patent Owner now wishes to designate Christopher N. Sipes as lead counsel and Andrea G. Reister as backup lead counsel in this proceeding. Mr. Sipes and Ms. Reister are each registered practitioners before the Office, and otherwise meet the requirements of 37 C.F.R. § 42.10.

No actions have occurred in this proceeding beyond the filing of the petition, the according of the petition of a filing date, and the filing of mandatory notices by

Patent Owner. In view of the early stage of this proceeding, “[w]ithdrawal can be accomplished without material adverse effect on the interests of the client.” 37 C.F.R. § 11.116(b)(1). Petitioner has indicated it does not oppose the withdrawal and substitution of counsel for Patent Owner since Patent Owner is not seeking to change the deadline for a preliminary response as a result. Finally, Patent Owner believes 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. CONCLUSION

Patent Owner respectfully requests that the Board grant its motion to authorize withdrawal of counsel and permit substitution of new lead and backup counsel. Upon granting of this motion, new counsel for Patent Owner will promptly file a new Power of Attorney and Updated Mandatory Notices.

Dated: March 21, 2017

Respectfully Submitted,

/Jeffrey P. Kushan/
Jeffrey P. Kushan
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Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 21st day of March 2017, the foregoing Patent Owner's Motion for Withdrawal and Substitution of Counsel, was served by electronic mail on the following counsel of record for petitioner.

Sharad K. Bijanki (sb@hkw-law.com)
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Date: March 21, 2017

/s/ Jeffrey P. Kushan
Jeffrey P. Kushan, Esq.
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