

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.,  
Petitioner,

v.

BRADIUM TECHNOLOGIES LLC,  
Patent Owner.

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Case IPR2018-00952  
Patent No. 9,253,239

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**CORRECTED UNOPPOSED MOTION TO WITHDRAW PATENT  
OWNER'S CONTINGENT MOTION TO AMEND**

## **I. Introduction**

On August April 1, 2019, Patent Owner filed a Contingent Motion to Amend in the present proceeding, *see* Paper 39, seeking to add amended claim 20 and new claim 21 to the case. Petitioner filed its Opposition, *see* Paper 42, on July 1, 2019. Patent Owner subsequently filed its Reply to Opposition, *see* Paper 44, on July 29, 2019, and Petitioner filed its Sur-Reply, *see* Paper 48, on September 3, 2019.

On September 11, 2019, Patent Owner was granted permission to file this Unopposed Motion to Withdraw via email.

## **II. Requested Relief**

Patent Owner seeks to withdraw its Contingent Motion to Amend. Patent Owner has met and conferred with opposing counsel and Petitioner does not oppose this motion. Accordingly, Patent Owner requests this motion be granted and that: 1) The Contingent Motion to Amend be withdrawn, and 2) no further argument on the withdrawn motion be allowed at Oral Argument.

Good cause exists for the granting of this Motion because no party will be prejudiced and because this Motion is being filed prior to oral argument in this matter.

### III. Request for Conference Call with the Board

Should the Board wish to discuss the matter further, Patent Owner hereby request a conference call with the Board to discuss any concerns prior to the Board issuing a decision on the Motion.

Respectfully submitted,

Dated: September 11, 2019

/s/ Michael E. Shanahan

Michael E. Shanahan

(Reg. No. 43,914)

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*Counsel for Patent Owner*

**37 C.F.R. §42.24(D) CERTIFICATION**

The undersigned hereby certifies that this submission, excluding the tables of contents, certificate of word count, exhibit list, and certificate of service, contains 222 words, as determined using the standard word counting feature of the Microsoft Word 2016 program.

Dated: September 11, 2019

/s/ Michael E. Shanahan

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*Counsel for Patent Owner*

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), the undersigned certifies that on September 11, 2019, the foregoing Corrected Bradium Technology's Unopposed Motion to Withdraw Patent Owner's Contingent Motion to Amend was served via electronic mail upon the following counsel of record for the Petitioner:

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