

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Canon Inc., Canon U.S.A., Inc., and Axis Communications AB,

Petitioner,

v.

Avigilon Fortress Corporation,

Patent Owner.

Case No. IPR2019-00311

Patent No. 7,932,923

PATENT OWNER'S MOTION TO WITHDRAW COUNSEL

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(e), and as authorized by the Board in an email dated October 24, 2019, Patent Owner Avigilon Fortress Corporation (“Avigilon”) respectfully requests that current lead counsel, Eugene Goryunov, be allowed to withdraw as lead counsel.

Avigilon has conferred with Petitioner's counsel, who does not oppose this motion.

II. STATEMENT OF FACT SUPPORTING WITHDRAWAL

On October 22, 2019, counsel for Avigilon requested authorization from the board to file this motion. The Board provided Avigilon with authorization to file this motion on October 24, 2019.

Eugene Goryunov has terminated his employment with counsel for Avigilon, Kirkland & Ellis, it is appropriate to allow him to withdraw as lead counsel.

The new lead counsel Reza Dokhanchy and back-up counsel Adam R. Alper, Akshay S. Deoras and Michael De Vries authorized to conduct business on behalf of Avigilon will remain in this proceeding. Accordingly, the withdrawal of Mr. Goryunov will not interfere or delay this proceeding.

III. CONCLUSION

Avigilon respectfully requests that the Board grant this motion, and allow Eugene Goryunov to withdraw as lead counsel.

Patent Owner's Motion to Withdraw Counsel
IPR2019-00311

Respectfully submitted,

Date: January 7, 2020

/s/ Reza Dokhanchy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's Motion to Withdraw Counsel** was served on January 7, 2020 via electronic service on lead and back up counsel:

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Dated: January 7, 2020

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