

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ASSA ABLOY AB, ASSA ABLOY Inc.,  
HID Global Corporation, ASSA ABLOY Global Solutions, Inc.,  
and Master Lock Company, LLC  
Petitioners,

v.

CPC Patent Technologies PTY LTD.,  
Patent Owner

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Case IPR2022-01045  
Patent No. 9,269,208

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**PETITIONERS' MOTION TO SUBSTITUTE  
AND WITHDRAW COUNSEL**

## **I. STATEMENT OF RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(e) and the Board's authorization in an email dated April 22, 2024, Petitioners ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corporation, ASSA ABLOY Global Solutions, Inc., and Master Lock Company, LLC respectfully request that the Board authorize the withdrawal of all counsel from Morgan, Lewis & Bockius LLP, including lead counsel Dion M. Bregman (Reg. No. 45,645), and the substitution of Lionel M. Lavenue (Reg. No. 46,859) as new lead counsel.

## **II. STATEMENT OF FACTS**

Petitioners designated lead counsel Dion M. Bregman and backup counsel Andrew V. Devkar and James J. Kritsas, all from Morgan, Lewis & Bockius LLP, in its mandatory notices filed June 3, 2022. (Paper 3). These attorneys and their law firm are no longer representing Petitioners in this IPR.

Petitioners filed new powers of attorney and updated mandatory notices on April 18, 2024, (Papers 51, 52, and 53) designating new backup counsel Lionel M. Lavenue, Kara A. Specht, Benjamin A. Saidman, Sydney R. Kestle, and Safiya Aguilar, all from Finnegan, Henderson, Farabow, Garrett & Dunner, LLP. Mr. Lavenue is familiar with the patent-at-issue, the prior art, and the briefing, and Petitioners do not seek any delay in the proceedings in connection with this motion.

Patent Owner does not oppose this motion.

### III. CONCLUSION

Petitioners respectfully request that Dion M. Bregman, Andrew V. Devkar, and James J. Kritsas be deemed withdrawn from the present proceeding, and that Petitioners be authorized to file updated mandatory notices designating Mr. Lavenue as lead counsel.

Respectfully submitted,

Dated: April 22, 2024

By: Lionel M. Lavenue/  
Lionel M. Lavenue  
Reg. No. 46,859

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing  
**PETITIONERS' MOTION TO SUBSTITUTE AND WITHDRAW**  
**COUNSEL** was served electronically on April 22, 2024 on counsel of record for  
the Patent Owner as follows:

Michael J. Rye  
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Dated: April 22, 2024

By: /Lisa C. Hines/  
Lisa C. Hines  
Case Manager

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP