

Filed on behalf of: Ford Motor Company

Entered: May 10, 2023

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner,

v.

NEO WIRELESS, LLC,
Patent Owner.

IPR2023-00764
Patent 10,965,512

**PETITIONER'S UNOPPOSED MOTION TO WITHDRAW COUNSEL
AND SUBSTITUTE LEAD COUNSEL**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(e), Petitioner, Ford Motor Company (“Ford”), respectfully requests that the Board authorize the withdrawal of Latham & Watkins LLP including lead counsel, Jonathan M. Strang (Reg. No. 61,724), and back-up counsel, Matthew J. Moore (Reg. No. 42,012), Ashley N. Finger (Reg. No. 78,093), and Kumar Ravula (Reg. No. 65,588) and the substitution of John S. LeRoy (Reg. No. 48,158) of Brooks Kushman as lead counsel and Christopher Smith (Reg. No. 59,669), also of Brooks Kushman, will remain as back-up counsel. The Board authorized the filing of the present motion in a May 9, 2023 email.

Patent Owner does not oppose. Petitioner is certifying “service [of this motion] on the client and counsel for Patent Owner,” as directed by the Board’s email of May 9. *See* attached Certificate of Service.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL

Jonathan M. Strang (Reg. No. 61,724) was appointed by Petitioner Ford and identified as lead counsel for the present *inter partes* review. Petitioner requests that the current designated lead counsel and back-up counsel, Matthew J. Moore (Reg. No. 42,012), Ashley N. Finger (Reg. No. 78,093), and Kumar Ravula (Reg. No. 65,588) be allowed to withdraw from the proceeding and John S. LeRoy (Reg. No. 48,158) be substituted as lead counsel. Christopher Smith (Reg. No. 59,669)

will remain as back-up counsel. John S. LeRoy was added as back-up counsel in the May 5, 2023 Updated Mandatory Notices and meets the requirements of 37 C.F.R. §42.10(c) for lead counsel.

No extensions of time will be sought by Substitute Lead Counsel as a result of the proposed substitution. Accordingly, this substitution will not cause any delay. If granted, Petitioner will promptly file an Updated Power of Attorney and Updated Mandatory Notices identifying substitute lead counsel.

III. CONCLUSION

Petitioner respectfully requests that the Board grant its motion to authorize the withdrawal of counsel and substitution of lead counsel.

Respectfully submitted,

Dated: May 10, 2023

By: / Jonathan M. Strang /

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*Counsel for Petitioner Ford Motor
Company*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 10th day of May, 2023, a true and correct copy of the foregoing **Petitioner's Unopposed Motion to Withdraw Counsel and Substitute Lead Counsel** was served by electronic mail on Patent Owner's lead and back-up counsel at the following email addresses:

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Pursuant to the Board's email dated May 9, 2023, the undersigned certifies that a true and correct copy of the foregoing **Petitioner's Unopposed Motion to Withdraw Counsel and Substitute Lead Counsel** was served on the official correspondence address for the patent shown in Patent Center:

Anthony Volpe
C. Koenig
VOLPE KOENIG
30 SOUTH 17TH STREET, 18TH FLOOR
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via FEDERAL EXPRESS next business day delivery, on May 10, 2023.

By: / Jonathan M. Strang /

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