UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIEMENS MOBILITY, INC., GROUND TRANSPORTATION SYSTEMS USA, INC., HUMATICS CORP., and PIPER NETWORKS, INC.,
Petitioners,

v.

METROM RAIL, LLC,
Patent Owner

Case IPR2023-00468
Patent No. 9,043,131

PETITIONERS' UNOPPOSED MOTION FOR WITHDRAWAL OF ZACHARY D. KACHMER AS COUNSEL

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

Pursuant to 37 C.F.R. 42.10(e), Petitioners Siemens Mobility, Inc., Ground Transportation Systems USA, Inc., Humatics Corp., and Piper Networks, Inc. ("Petitioners") respectfully request that the Board authorize withdrawal of Zachary D. Kachmer as back-up counsel in this matter.

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

On January 13, 2023, Petitioners submitted its Power of Attorney appointing Zachary D. Kachmer as back-up counsel in the above-captioned *Inter Partes* Review (Paper 1, 2, 3, and 4).

For good cause, petitioner requests that Zachary D. Kachmer be deemed withdrawn from the present proceeding. The good cause includes that Mr. Kachmer has left the firm of Faegre Drinker Biddle & Reath LLP, which represents Petitioner Ground Transportation Systems USA Inc. in the present matter.

The remaining counsel of record from Faegre Drinker Biddle & Reath LLP (Thatcher A. Rahmeier) will remain backup counsel of record representing Petitioner Ground Transportation Systems USA Inc.

Reasonable steps have been taken to avoid any foreseeable prejudice to the rights of the Petitioners. Granting this motion will not hinder the economy or integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding.

III. PATENT OWNER DOES NOT OBJECT TO THE SUBSTITUTION

Patent Owner has indicated it does not oppose the requested withdrawal of counsel for Petitioners.

Dated: September 4, 2024

Respectfully submitted,

By: */Thatcher A. Rahmeier/*

Thatcher A. Rahmeier, Reg. No. 65,734
FAEGRE DRINKER BIDDLE & REATH LLP
222 Delaware Ave., Suite 1410
Wilmington, DE 19801
(302) 467-4200
thatcher.rahmeier@faegredrinker.com

Attorney for Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, pursuant to 37 CFR § 42.6(e), a copy of the foregoing **PETITIONERS' MOTION FOR WITHDRAWAL OF COUNSEL** was served electronically via electronic mail on counsel for the Patent Owner as follows:

MetromIPR@mcandrews-ip.com

Dated: September 4, 2024

By: */Thatcher A. Rahmeier/*
Thatcher A. Rahmeier