UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IRIUSRISK, INC.,
Petitioner,

v.

THREATMODELER SOFTWARE INC.,
Patent Owner.

Case IPR2023-00656
Patent 10,713,366

PATENT OWNER'S UNOPPOSED MOTION TO WITHDRAW WAYNE M. HELGE AS LEAD COUNSEL, CHRISTOPHER H. BLASZKOWSKI AS BACK-UP COUNSEL, AND TO SUBSTITUTE NEW LEAD AND BACKUP COUNSEL

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.10, 42.20, 42.22, and 42.8, and as authorized by the Board by email transmitted on December 7, 2023, Patent Owner ThreatModeler Software Inc. respectfully requests that the Board authorize the withdrawal of Wayne M. Helge as lead counsel, the withdrawal of Christopher H. Blaszkowski as backup counsel, the substitution of Donald L. Jackson as new lead counsel, and the substitution of Marc Kaufman as new backup counsel for Patent Owner in the above-captioned proceeding.

II. SHOWING OF GOOD CAUSE

On May 11, 2023, Patent Owner filed its Mandatory Notices identifying Wayne M. Helge as lead counsel and Christopher H. Blaszkowski as backup counsel in this proceeding.

Consistent with the new power of attorney identifying Patent Owner's desired lead and backup counsel for this case, counsel for Patent Owner respectfully requests that Messrs. Helge and Blaszkowski be permitted to withdraw as counsel of record and that Donald L. Jackson, a registered practitioner who meets the requirements of 37 C.F.R. § 42.10, be permitted to substitute as new lead counsel of record. Patent Owner also requests that Marc Kaufman, a registered practitioner who meets the requirements of 37 C.F.R. § 42.10, be permitted to substitute as new backup counsel of record.

The withdrawal of Messrs. Helge and Blaszkowski will not cause any material prejudice to any party or any delay in this proceeding. *See* 35 U.S.C. § 316(b).

Patent Owner will file Updated Mandatory Notices within the timeframe set by the Board. Additionally, Patent Owner's new Power of Attorney is being submitted as exhibit 2001, identifying the Registration Numbers for new lead counsel and backup counsel.

Counsel for Petitioner has indicated that Petitioner will not oppose this motion.

III. CONCLUSION

Patent Owner respectfully requests that the Board grant its unopposed motion to authorize the withdrawal of Wayne M. Helge as lead counsel and Christopher H. Blaszkowski as backup counsel, and to permit the substitution Donald L. Jackson as new lead counsel, and the substitution of Marc Kaufman as new backup counsel for Patent Owner in the above-captioned proceeding.

Dated: December 7, 2023

/s/ *Wayne M. Helge*
Wayne M. Helge (Reg. No. 56,905)
NOSSAMAN, LLP
1401 New York Ave, NW
Suite 800
Washington, DC 20005
Telephone: (202) 887-1400
Email: whelge@nossaman.com

Christopher H. Blaszkowski
(Reg. No. 61,461)
RATNERPRESTIA
2200 Renaissance Blvd
Suite 350
King of Prussia, PA 19406
Telephone: 610-407-0700
Email: cblaszkowski@ratnerprestia.com

Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2023, a true and correct copy of the foregoing document was served via email, by consent, to Petitioner by serving the correspondence email addresses of record as follows:

Brent Yamashita
Reg. No. 53,808
DLA Piper LLP (US)
2000 University Avenue
East Palo Alto, California
94303-2214
Phone: 650.833.2348
Fax: 650.833.2001
Email:
brent.yamashita@us.dlapiper.com

Blake Jackson
Reg. No. 66,272
DLA Piper LLP (US)
2000 University Avenue
East Palo Alto, California
94303-2214
Phone: 650.833.2248
Fax: 650.687.1148
Email:
blake.jackson@us.dlapiper.com

Matthew Middleton
Reg. No. 77,117
DLA Piper LLP (US)
1201 N. Market St., Suite 2100
Wilmington, Delaware
19801-1147
Phone: 302.468.5675
Fax: 302.778.7935
Email:
matthew.middleton@us.dlapiper.com

/s/ *Wayne M. Helge*
Wayne M. Helge (Reg. No. 56,905)
Attorney for Patent Owner