

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MIANYANG BOE OPTOELECTRONICS TECHNOLOGY CO., LTD.; WUHAN
CHINA STAR OPTOELECTRONICS SEMICONDUCTOR DISPLAY
TECHNOLOGY CO., LTD.; TIANMA MICROELECTRONICS CO. LTD.; AND
VISIONOX TECHNOLOGY, INC.
Petitioner,

v.

SAMSUNG DISPLAY CO., LTD.
Patent Owner.

Case No. IPR2023-00941
U.S. Patent No. 7,414,599

PETITIONER'S MOTION FOR WITHDRAWAL OF COUNSEL

Pursuant to 37 C.F.R. § 42.10, Petitioner Mianyang BOE Optoelectronics Technology Co., Ltd., Wuhan China Star Optoelectronics Semiconductor Display Technology Co., Ltd., Tianma Microelectronics Co. Ltd., and Visionox Technology, Inc. (“Petitioner”) respectfully requests that the Patent Trial and Appeal Board authorize withdrawal of Donald Daybell as back-up counsel.

I. STATEMENT SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Back-up counsel Donald Daybell is no longer affiliated with Orrick, Herrington & Sutcliffe LLP as of January 15, 2024. Given Mr. Daybell’s departure from the firm, Petitioner requests that Mr. Daybell be deemed withdrawn from the present proceeding. Mr. Travis Jensen, also of Orrick, Herrington and Sutcliffe, LLP, will continue to represent Petitioner as lead counsel. Mr. Xiang Wang, also of Orrick, Herrington and Sutcliffe, LLP, will continue to represent Petitioner as back-up counsel. Updated mandatory notices under 37 C.F.R. § 42.8(b)(3) reflecting the above identification of counsel have been filed.

Reasonable steps have been taken to “avoid foreseeable prejudice to the rights of the client, including giving due notice to [the] client . . . ,” and through Messrs. Jensen’s and Wang’s continuing representation as lead and back-up counsel, respectively. *See* 37 C.F.R. § 10.40(a). Furthermore, no changes to the schedule will be needed based on this motion. Therefore, Petitioner believes that granting this

motion will not hinder “the economy, the integrity of the patent system, the efficient administration of the Office, and the ability of the Office to timely complete [this] proceeding[.]” *See* 35 U.S.C. § 316(b).

II. PATENT OWNER CONSENTS TO THE SUBSTITUTION

Petitioner has notified Patent Owner of Mr. Daybell’s pending withdrawal, and Patent Owner has consented to Petitioner’s request.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board authorize the withdrawal of Mr. Daybell as back-up counsel.

Dated: January 23, 2024

Respectfully submitted,

/Travis Jensen/
Travis Jensen
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CERTIFICATE OF SERVICE

The undersigned certifies that on January 23, 2024, a copy of the following was served in its entirety via electronic mail, upon the following attorneys of record for the Patent Owner:

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/Karen Johnson/
Karen Johnson