UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY INTERACTIVE ENTERTAINMENT LLC
Petitioner

v.

QUANTUM IMAGING LLC
Patent Owner

Case IPR2023-00996
Patent 10,991,165

PETITIONER SONY INTERACTIVE ENTERTAINMENT LLC'S UNOPPOSED MOTION FOR WITHDRAWAL AND SUBSTITUTION OF LEAD COUNSEL

I. 37 C.F.R. § 42.10 Statement of Relief Requested

Pursuant to 37 C.F.R. § 42.10, Petitioner Sony Interactive Entertainment LLC ("Petitioner" or "SIE") respectfully requests that the Board authorize withdrawal of Melvin D. Chan, as its Lead Counsel, and Gary T. Aka, as its Backup Counsel, both of Aka Chan LLP, and substitution of Philip W. Woo as Lead Counsel and Patrick D. McPherson, Monte T. Squire, and Paul Belnap as Backup Counsel, all of Duane Morris LLP.

II. Statement Showing Good Cause for the Board to Authorize Withdrawal and Substitute of Counsel

On January 24, 2024, Petitioner sent an email to the Board requesting permission to file a Motion for Withdrawal and Substitute of Lead Counsel and Backup Counsel. On January 24, 2024, the Board notified Petitioner via email that it was authorized to file the instant motion.

For good cause, Petitioner requests that the current designated Lead Counsel, Melvin D. Chan and current Backup Counsel, Gary T. Aka, be deemed withdrawn from the present proceeding, and Philip W. Woo be substituted as Lead Counsel and Patrick D. McPherson, Monte T. Squire, and Paul Belnap be substituted as Backup Counsel to represent Petitioner in this proceeding.

Substitute Lead Counsel meets the requirements of 37 C.F.R. § 42.10(c) as Lead Counsel is a registered practitioner. Reasonable steps have been taken to "avoid foreseeable prejudice to the rights of the client, including giving due notice to his or her client, [and] allowing time for employment of another practitioner." See 37 C.F.R. § 10.40(a). Further, Petitioner believes that granting this motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. See 35 U.S.C. § 316(b). The requisite power of attorney will be filed by the Substitute Counsel.

III. Patent Owner Does Not Object to the Substitution

Patent Owner has indicated it does not oppose the requested withdrawal and substitution of Lead Counsel and the Backup Counsel for Petitioner.

IV. Conclusion

Petitioner respectfully requests that the Board grant its motion to authorize withdrawal of counsel and permit substitution of counsel. Upon grant of this motion, new Lead Counsel and the Backup Counsel for Petitioner will promptly file an Updated Mandatory Notice Under 37 C.F.R. §§ 42.8(a)(3). And the requisite power of attorney will be filed by the Substitute Counsel.

Date: January 29, 2024 Respectfully submitted,

Aka Chan LLP

/ Melvin D. Chan /

Melvin D. Chan
Reg. No. 39,626

Aka Chan LLP
900 Lafayette Street, Suite 710
Santa Clara, CA 95050
Tel: (408) 701-0035
Fax: (408) 872-4735
E-mail: mel@akachanlaw.com

Attorney for Petitioner

Certificate of Service

The undersigned certifies that in accordance with 37 C.F.R. § 42.6(e) and concurrently with the submission of this document to the United States Patent and Trademark Office, a complete copy of this document has been e-mailed to lead and backup counsel for Patent Owner at:

Kevin S. Tuttle (ktuttle@spencerfane.com),

Erick S. Robinson (erobinson@spencerfane.com),

Patrick M. Dunn (pdunn@spencerfane.com),

Kyle L. Elliot (kelliott@spencerfane.com),

Homayoon Rafatijo (hrafatijo@spencerfane.com), and

Marc Brockhaus (mbrockhaus@dunlapcodding.com).

Date: January 26, 2024 Certified by:

Aka Chan LLP

/ Melvin D. Chan /

Melvin D. Chan
Reg. No. 39,626

Aka Chan LLP
900 Lafayette Street, Suite 710
Santa Clara, CA 95050
Tel: (408) 701-0035
Fax: (408) 872-4735
E-mail: mel@akachanlaw.com