

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WENZHOU XIN XIN SANITARY WARE CO., LTD.,
Petitioner

v.

DELTA FAUCET COMPANY.
Patent Owner

Case No.: IPR2023-01332
U.S. Patent No. 11,473,277

**PATENT OWNER'S MOTION TO AUTHORIZE
WITHDRAWAL OF COUNSEL AND APPOINTMENT
OF NEW POWER OF ATTORNEY**

I. Statement of Precise Relief Requested

Pursuant to 37 C.F.R. § 42.10, Patent Owner Delta Faucet Company (“Delta”) requests that the Patent Trial and Appeal Board (“the Board”) authorize the withdrawal of lead counsel George D. Moustakas, as well as the appointment of Michael P. Doerr as backup counsel via a new Power of Attorney. Petitioner has indicated that it does not oppose this motion.

II. Basis for Withdrawal of Counsel and Appointment of a New Power of Attorney

Mr. Moustakas will be retiring at the end of this year and Delta now seeks to relieve Mr. Moustakas from representing Delta in the current proceeding, and to appoint Michael P. Doerr as back-up counsel. Accordingly, Delta intends to revoke the prior Power of Attorney and appoint new counsel as follows:

Lead Counsel	Backup Counsel
David P. Utykanski HARNESS DICKY & PIERCE, P.L.C. 5445 Corporate Dr., Suite 200 Troy, MI 48098 Phone: 248-641-1600 Fax: 248-641-0270 email: davidu@hdp.com USPTO Reg. No. 39,052	Michael P. Doerr HARNESS DICKY & PIERCE, P.L.C. 5445 Corporate Dr., Suite 200 Troy, MI 48098 Phone: 248-641-1600 Fax: 248-641-0270 email: mdoerr@hdp.com USPTO Reg. No. 52,825

Mr. Utykanski was previously designated as back-up counsel for Delta in this matter and is now designated as lead counsel.

Delta respectfully requests that the Board grant this Motion to Authorize Withdrawal of George D. Moustakas and appointment of a new Power of Attorney. Delta submits herewith a new Power of Attorney and Updated Mandatory Disclosures.

Dated: December 21, 2023 Respectfully submitted,

/David P. Utykanski/
DAVID P. UTYKANSKI
HARNESS DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270
davidu@hdp.com
mdoerr@hdp.com

Attorneys for Delta Faucet Company

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e)(4), that service of the foregoing MOTION TO AUTHORIZE WITHDRAWAL OF COUNSEL AND APPOINTMENT OF NEW POWER OF ATTORNEY, was made by email on the Petitioner as detailed below.

Timothy T. Wang, Reg. No. 61,554
Nicholas Najera, Reg. No. 81,833
Ni, Wang & Massand, PLLC
8140 Walnut Hill Ln., Ste. 615
Dallas, TX 75081
twang@nilawfirm.com
nnajera@nilawfirm.com

Dated: December 21, 2023 /David P. Utykowski/
DAVID P. UTYKANSKI
HARNESS DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Suite 200
Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270
davidu@hdp.com
mdoerr@hdp.com

Attorneys for Delta Faucet Company