

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORPORATION
Petitioner

v.

INPRIA CORPORATION
Patent Owner

Case IPR2024-00033
Patent No. 9,823,564

**PATENT OWNER'S MOTION FOR WITHDRAWAL AND
SUBSTITUTION OF COUNSEL**

I. RELIEF REQUESTED

Pursuant to 37.C.F.R. § 42.10, Patent Owner Inpria Corporation (“Patent Owner”) respectfully requests that the Patent Trial and Appeal Board authorize withdrawal of Joshua A. Griswold, Christopher C. Bowley, and Gretchen DeVries as counsel and appoint Naveen Modi as lead counsel.

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

Given its desire to change counsel, Patent Owner requests that Joshua A. Griswold, Christopher C. Bowley, and Gretchen DeVries of Fish & Richardson P.C. be deemed withdrawn from the present proceeding and that Naveen Modi of Paul Hastings LLP be designated as lead counsel to represent Patent Owner in this proceeding. Phillip Citroën, Eric Dittmann, Isaac S. Ashkenazi, and Paul Anderson, also with Paul Hastings LLP, will continue to represent Patent Owner as back-up counsel.

Naveen Modi meets the requirements of 37 C.F.R. § 42.10 as lead counsel and a registered practitioner. He is associated with Customer Number 36,183, which Patent Owner’s power of attorney designated as counsel in this matter on November 21, 2023. Paper 6. Updated mandatory notices under 37 C.F.R. § 42.8(b)(3) are being filed concurrently herewith.

In identifying and designating Mr. Modi as lead counsel who is ready and able to take over the representation and maintaining Messrs. Citroën, Dittmann,

Ashkenazi, and Anderson as back-up counsel, 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. § 42.40(a). Furthermore, no changes to the schedule will be needed based on this motion. Therefore, Patent Owner 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).

III. PETITIONER DOES NOT OBJECTION TO THE SUBSTITUTION

Petitioner has indicated it does not oppose the requested withdrawal and substitution of counsel for Petitioner.

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board authorize the withdrawal of current counsel and substitution of new counsel.

Dated: December 6, 2023

Respectfully submitted,

/Naveen Modi/

Naveen Modi (Reg. No. 46,224)
Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2023, a copy of the foregoing Patent Owner's Motion for Withdrawal and Substitution of Counsel was served by electronic means, as agreed by the parties, upon Counsel for Petitioner at the following addresses of record:

Dion M. Bregman (Reg. No. 45,645)
Michael J. Lyons (Reg. No. 37,386)
Ahren C. Hsu-Hoffman (Reg. No. 50,862)
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Dated: December 6, 2023

Respectfully submitted,

/Naveen Modi/
Naveen Modi
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