

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRUCTURAL WRAP, LLC,
Petitioner

v.

SYSTEM STORMSEAL PTY LTD, STORMSEAL USA, LLC,
Patent Owner

Case IPR2024-00084
Patent 11,168,484

**PETITIONER'S MOTION TO
WITHDRAW COUNSEL**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. §42.10(e), Petitioner Structural Wrap, LLC, respectfully requests that the Board authorize the withdrawal of its backup counsel, Megan Raymond and J. Steven Baughman, leaving current lead counsel (Christian Sanchelima) and first backup counsel (Jesus Sanchelima) of record for Petitioner. *See* Pap.10. The parties have conferred regarding Petitioner's request to withdraw counsel, and Patent Owner has indicated that it will not oppose. The Board authorized the filing of the present motion in a March 19, 2024 e-mail.

II. STATEMENT OF REASONS FOR WITHDRAWAL OF COUNSEL

Petitioner requests that Megan Raymond (Reg. No. 72,997) and J. Steven Baughman (Reg. No. 47,414) be allowed to withdraw from the present proceeding. Current lead counsel (Christian Sanchelima) and first backup counsel (Jesus Sanchelima) will remain as counsel of record for Petitioner. *See* Pap.10.

Petitioner's petition was filed on October 28, 2023. Patent Owner filed a preliminary response on February 13, 2024. The Board has not yet issued a decision on institution. Petitioner does not expect that this withdrawal will cause any delay in the proceeding or prejudice to the Patent Owner in any way.

III. CONCLUSION

Petitioner respectfully requests that the Board grant this motion to authorize the withdrawal of counsel.

Dated: March 21, 2024

Respectfully submitted,

By: /Megan Raymond /

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Attorneys for Petitioner Structural Wrap, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of PETITIONER’S MOTION TO WITHDRAW COUNSEL has been served in its entirety by causing the aforementioned document to be electronically mailed to the following attorneys of record for Patent Owner listed below:

Patent Owner’s Counsel of Record:

Lead Counsel:	Ryan Loveless (Reg. No. 51,970) Loveless Law Group 4760 Preston Road No. 244-357 Frisco, TX 75034 ryan@lovelesslawgroup.com 972-292-8303 By Electronic Mail
Backup Counsel:	Travis Richins Loveless Law Group 4760 Preston Road No. 244-357 Frisco, TX 75034 travis@lovelesslawgroup.com 214-601-0678 <u>IPR2024-00084@lovelesslawgroup.com</u> By Electronic Mail

Dated: March 21, 2024

Respectfully submitted,
By: /Sayem Osman/
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