

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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DROPBOX, INC.  
Petitioner

v.

MOTION OFFENSE, LLC  
Patent Owner

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IPR2024-00287  
U.S. Patent No. 11,611,520

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**PETITIONER'S UNOPPOSED MOTION FOR  
WITHDRAWAL OF COUNSEL SCOTT BERTULLI  
PURSUANT TO 37 C.F.R. § 42.10(e)**

**I. STATEMENT OF RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(e), and as authorized in the Board’s email of December 20, 2024, Petitioner Dropbox, Inc. respectfully requests that the Board authorize withdrawal of Scott Bertulli as counsel in this proceeding, IPR2024-00287.<sup>1</sup> Petitioner has conferred with Patent Owner, and Patent Owner does not oppose this motion.

**II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR  
WITHDRAWAL OF COUNSEL SCOTT BERTULLI**

Counsel Scott Bertulli is no longer affiliated with Wilmer Cutler Pickering Hale & Dorr LLP as of September 12, 2024. Given Mr. Bertulli’s departure from the firm, Petitioner requests that Mr. Bertulli be deemed withdrawn from the present proceeding. As set forth in Petitioner’s Updated Mandatory Notice Pursuant to 37 C.F.R. § 42.8(b)(3) filed on September 17, 2024, Mr. Trishan Efram will represent Petitioner as lead counsel and Mr. Gregory H. Lantier and Ms. Liv. L. Herriot will represent Petitioner as backup counsel. *See* Paper 14. The Board granted Petitioner’s Motion for *Pro Hac Vice* Admission of Mr. Lantier and Ms. Herriot on

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<sup>1</sup> Petitioner is concurrently filing an unopposed motion to withdraw Scott Bertulli as counsel for Petitioner in IPR2024-00286.

October 1, 2024. *See* Paper 18. Mr. Efram, Mr. Lantier, and Ms. Herriot are all of Wilmer Cutler Pickering Hale & Dorr LLP.

Reasonable steps have been taken to “avoid foreseeable prejudice to the rights of the client, including giving due notice to [the] client . . . ,” and through Mr. Efram as lead counsel and Mr. Lantier and Ms. Herriot as backup counsel. *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).

### **III. CONCLUSION**

For the foregoing reasons, Petitioner respectfully requests that the Board authorize withdrawal of Scott Bertulli as counsel in this proceeding.

Respectfully Submitted,

Date: December 23, 2024

/Trishan Efram/

Trishan Efram  
Registration No. 74,075  
Counsel for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 23, 2024, I caused a true and correct copy  
of the foregoing materials:

- Petitioner's Unopposed Motion for Withdrawal of Counsel Scott Bertulli Pursuant to 37 C.F.R. § 42.10(e)

to be served via electronic mail by consent on counsel of record at:

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Respectfully Submitted

/Trishan Efram/

Trishan Efram

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