

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AT&T MOBILITY LLC, AT&T SERVICES INC., ERICSSON INC.,
NOKIA OF AMERICA CORPORATION, AND T-MOBILE USA, INC.,
PETITIONERS,

v.

DAINGEAN TECHNOLOGIES LTD.,
PATENT OWNER.

CASE IPR2024-00402
PATENT 10,841,958

PATENT OWNER'S UNOPPOSED MOTION TO SUBSTITUTE LEAD
COUNSEL AND WITHDRAW SELECT BACKUP COUNSEL¹
37 C.F.R. §§ 42.10(e) and 42.20

¹ Patent Owner received authorization from the Board to file this motion on September 11, 2024 by email.

I. A STATEMENT OF THE PRECISE RELIEF REQUESTED

Daingean Technologies Ltd. seeks to have two attorneys represent Patent Owner going forward: Joshua S. Wyde as lead counsel and Christopher L. Limbacher as backup counsel. To that end, Patent Owner seeks to:

1. Withdraw R. Allan Bullwinkel (Reg. No. 77,630) of Heim Payne & Chorush, LLP (“HPC”), lead counsel, from the case;
2. Substitute Joshua S. Wyde (Reg. No. 57,698) of Alavi & Anaipakos PLLC (“AA”) as lead counsel;
3. Withdraw backup counsel, Michael F. Heim (Reg. No. 32,702) also of HPC, and any other practitioners associated with HPC’s Customer Number 90471, except Christopher L. Limbacher (Reg No. 76,551) of HPC who will remain as backup counsel; and,
4. Withdraw Michael McBride (admitted *Pro Hac Vice*, see Paper 11) of AA as backup counsel.

II. A FULL STATEMENT OF THE REASONS FOR THE RELIEF REQUESTED, INCLUDING A DETAILED EXPLANATION OF THE SIGNIFICANCE OF THE EVIDENCE INCLUDING MATERIAL FACTS, AND THE GOVERNING LAW, RULES, AND PRECEDENT

Patent Owner seeks to remove all counsel who are, or who may become, subject to the prosecution bar contained in the protective order issued in previously related litigations. *See* Paper 2 at 1; Paper 6 at 2. This change of counsel will allow

Patent Owner to file a motion to amend in this proceeding and comply with the protective order in the District Court.

If granted, Patent Owner will still have a lead and backup counsel as required. *See* 37 C.F.R. § 42.10(a). Additionally, the remaining counsel are experienced with the IPR proceedings, generally, and this proceeding, specifically, including being familiar with U.S. Patent No. 10,841,958 and the merits papers filed in the proceeding so far. Therefore, the withdrawal and substitution will not delay the proceedings or prejudice Petitioner or Patent Owner.

Petitioner does not oppose this motion.

III. CONCLUSION

Should the Board grant this motion, Patent Owner will expeditiously file Updated Mandatory Notices to reflect the change in counsel.

Dated: September 11, 2024

Respectfully submitted,

/R. Allan Bullwinkel/

R. Allan Bullwinkel (Reg. No. 77,630)

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Counsel for Patent Owner,
DAINGEAN TECHNOLOGIES LTD.

CERTIFICATE OF SERVICE

The undersigned certifies that on the eleventh day of September, 2024, a complete and entire copy of the foregoing “PATENT OWNER’S UNOPPOSED MOTION TO SUBSTITUTE LEAD COUNSEL AND WITHDRAW SELECT BACKUP COUNSEL,” including exhibits, if any, was served on the following counsel of record via email per Petitioners’ consent to electronic service. *See* Paper 2 at 1:

Petitioners’ Distribution List	ATT_Daingean@mckoolsmith.com.
Scott W. Hejny	shejny@McKoolSmith.com
Eric Hansen	ehansen@McKoolSmith.com

Dated: September 11, 2024 /R. Allan Bullwinkel/
R. Allan Bullwinkel (Reg. No. 77,630)

Counsel for Patent Owner,
DAINGEAN TECHNOLOGIES LTD.