

Filed on behalf of: Abbott Laboratories and Abbott Diabetes Care Inc.

Entered: April 1, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ABBOTT LABORATORIES and
ABBOTT DIABETES CARE INC.,
Petitioner,

v.

ALTIVERA, LLC,
Patent Owner.

Case IPR2024-00425
Patent 7,969,307 B2

**PETITIONER'S UNOPPOSED MOTION TO WITHDRAW
LEAD COUNSEL**

Exhibit List

Ex.	Description
1001	U.S. Patent No. 7,969,307 B2 (“’307 patent”)
1002	File History of U.S. Patent No. 7,969,307 B2 (“’307 FH”)
1003	Declaration of Majid Sarrafzadeh (“Sarrafzadeh Decl.”)
1004	<i>Curriculum Vitae</i> of Majid Sarrafzadeh
1005	U.S. Patent No. 7,148,803 B2 (“Bandy”)
1006	U.S. Utility Patent Application Transmittal for U.S. Patent No. 7,148,803 B2 (“As-Filed Bandy Application”)
1007	U.S. Patent Application Publication No. US 2002/0178126 A1 (“Beck”)
1008	RESERVED
1009	U.S. Patent No. 6,031,454 (“Lovejoy”)
1010	Assignment of U.S. Patent Application No. 10/761,362 from Peeters to Altivera L.L.C., executed Dec. 2, 2005
1011	Assignment of U.S. Patent Application No. 10/761,362 from Peeters to Altivera, LLC, executed Feb. 10, 2006
1012	Assignment of U.S. Patent Application No. 10/761,362 from Bandy to Symbol Technologies, Inc., executed Feb. 11, 2006
1013	RESERVED
1014	Gentag’s Response to Abbott’s Initial Invalidity Contentions: Response to Exhibit 1 Regarding Invalidity Based on U.S. Patent No. 7,148,803 “Radio frequency identification (RFID) based sensor networks” (“Bandy”), <i>Gentag, Inc. v. Abbott Laboratories</i> , No. 1:23-cv-00310 (N.D. Ill. Aug. 15, 2023) (“Gentag Invalidity Resp.”)

Ex.	Description
1015	U.S. Patent No. 6,987,965 B2 (“Ng”)
1016	World Intellectual Property Organization, International Publication No. WO 02/058537 A2 (“Heller”)
1017	Third Report & Order, <i>In re Revision of the Comm’n’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Sys.</i> , CC Docket No. 94-102, 14 FCC Rcd. 17388, 1999 WL 795989 (FCC adopted Sept. 15, 1999; released Oct. 6, 1999), http://standards.fcc.gov/gov_affairs/fcc_filings/documents/e911rand.pdf (“FCC Report”)
1018	U.S. Patent No. 6,002,344 (“Bandy-344”)
1019	U.S. Patent No. 7,797,367 B1 (“Gelvin”)
1020	U.S. Patent No. 6,416,471 B1 (“Kumar”)
1021	U.S. Patent No. 6,978,182 B2 (“Mazar”)
1022	U.S. Patent No. 6,720,887 B1 (“Zunti”)
1023	U.S. Patent Application Publication No. 2003/0229723 A1 (“Kangas”)
1024	U.S. Patent Application Publication No. 2002/0165443 A1 (“Mori”)
1025	RESERVED
1026	NEWTON’S TELECOM DICTIONARY (18th ed. 2002) (excerpted)
1027	U.S. Patent No. 7,446,646 B2 (“Huomo”)
1028	U.S. Patent No. 6,989,750 B2 (“Shanks”)
1029	U.S. Patent No. 7,844,505 B1 (“505 patent”)
1030	Transcript of the Deposition of William Bandy, Ph.D., taken December 18, 2024 (“Bandy Dep.”)

Ex.	Description
1031	Transcript of the Deposition of Steven Warren, Ph.D., taken December 19, 2024 (“Warren Dep.”)
1032	Transcript of the Deposition of John P. Peeters, Ph.D., taken January 8, 2025 (“Peeters Dep.”)
1033	Supplemental Declaration of Majid Sarrafzadeh (“Sarrafzadeh2”)
1034	Email from Board to Counsel Authorizing Motion to Withdraw (March 31, 2025)

Pursuant to 37 C.F.R. §§ 42.10(e) and 42.20(b), Petitioner Abbott Laboratories and Abbott Diabetes Care Inc. respectfully request the withdrawal of S. Giri Pathmanaban (Reg. No. 75,986) as its lead counsel. Petitioner will appoint current backup counsel Michael A. Morin (Reg. No. 40,734) as new lead counsel. Should this motion be granted, Petitioner will file an updated mandatory notice and Power of Attorney reflecting this change.

Authorization for this motion was granted by the Board via e-mail on March 31, 2025. Ex. 1034. The parties have conferred and Patent Owner does not oppose this motion.

The withdrawal will not have an adverse effect on Patent Owner or otherwise delay this proceeding.

Respectfully submitted,

Dated: April 1, 2025

By: / Steven W. Peters /

Steven W. Peters (Reg. No. 73,193)
steven.peters@lw.com
Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, D.C. 20004-1304
Telephone: 202.637.2200
Fax: 202.637.2201

*Counsel for Petitioner
Abbott Laboratories and Abbott
Diabetes Care Inc.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 1st day of April, 2025, a true and correct copy of the foregoing **Petitioner's Unopposed Motion to Withdraw Lead Counsel and Exhibit 1034** were served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

David Pekarek Krohn
PERKINS COIE LLP
33 East Main Street, Suite 201
Madison, WI 53703-3095
Telephone: (608) 663-7460
Fax: (608) 663-7499
pekarekkrohn-ptab@perkinscoie.com
Gentag-IPR@perkinscoie.com

Rodger Carreyn
PERKINS COIE LLP
33 East Main Street, Suite 201
Madison, WI 53703-3095
Telephone: (608) 663-7460
Fax: (608) 663-7499
carreyn-ptab@perkinscoie.com

Christopher G. Hanewicz
PERKINS COIE LLP
33 East Main Street, Suite 201
Madison, WI 53703-3095
Telephone: (608) 663-7460
Fax: (608) 663-7499
CHanewicz@perkinscoie.com

By: / Steven W. Peters /

Steven W. Peters (Reg. No. 73,193)
steven.peters@lw.com
Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, D.C. 20004-1304
Telephone: 202.637.2200
Fax: 202.637.2201

*Counsel for Petitioner
Abbott Laboratories and Abbott Diabetes
Care Inc.*