

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOTE, LLC,
Petitioner,

v.

STEAMBOAT PADDLESPORTS LLC,
Patent Owner.

Case No. IPR2024-00889
U.S. Patent No. 10,479,458

**UNOPPOSED MOTION FOR WITHDRAWAL FROM
REPRESENTATION OF PATENT OWNER**

I. 37 C.F.R. § 42.10 – STATEMENT OF RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Lead Counsel, Michael L. Krashin, and Back-Up Counsel, Alaina Pak, respectfully move that the Patent Trial and Appeal Board grant this Motion for Withdrawal from Representation of Patent Owner, Steamboat Paddlesports LLC (“Patent Owner”). Counsel thanks the Board for authorizing Patent Owner’s Counsel to file a Motion to Withdraw in accordance with the Telephonic Scheduling Conference held on January 23, 2025.

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

A. Basis for Withdrawal

Patent Owner owns U.S. Patent No. 10,479,458 and is the real party-in-interest in the above captioned matter. On June 3, 2024, former Patent Owner Twitch LLC d/b/a Hala Gear authorized the filing of Patent Owner’s Mandatory Notices (Paper No. 5) appointing Michael L. Krashin and Alaina Pak as lead and back-up counsel. On July 26, 2024, Twitch LLC d/b/a Hala Gear assigned U.S. Patent No. 10,479,458 to Steamboat Paddlesports LLC d/b/a Hala Gear (“Steamboat Paddlesports”). Patent Owner recently informed Counsel that they are discharging counsel at Banner Witcoff in connection with the above referenced IPR. Accordingly, Banner Witcoff believes that its withdrawal is “mandatory.” *See* 37 C.F.R. § 10.40(b)(4). For good cause, Counsel now moves that the Board grant this Motion for Withdrawal from Representation of Patent Owner. Patent Owner is

discharging Counsel, and Patent Owner agrees that Counsel should be withdrawn. Counsel for Bote has already explained to the Board that Bote does not oppose this Motion.

B. Steps Taken to Avoid Foreseeable Prejudice

Counsel has met its obligations under 37 C.F.R. § 10.40(a) by taking “reasonable steps to avoid foreseeable prejudice to the rights of the client.” As Counsel explained during the Telephonic Scheduling Conference, Steamboat Paddlesports has the Scheduling Order (and all other papers in this proceeding), and after the Telephonic Scheduling Conference today, Counsel once again sent a copy of the Scheduling Order in this proceeding to Steamboat Paddlesports and reminded Steamboat Paddlesports of the deadlines, including the upcoming current deadline of February 18 for the Patent Owner’s Preliminary Response to the Petition.

III. CONCLUSION

In light of the foregoing, Counsel respectfully requests that the Board grant this Motion for Withdrawal from Representation of Patent Owner in this proceeding by Michael L. Krashin and Alaina Pak at Banner Witcoff.

Respectfully submitted,

Dated: January 23, 2025

By: /Michael L. Krashin/

Michael L. Krashin (Reg. No. 62,072)

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Attorney for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on January 23, 2025, a copy of MOTION FOR WITHDRAWAL FROM REPRESENTATION OF PATENT OWNER was served on the Petitioner by emailing a copy to the following:

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Dated: January 23, 2025

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