

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN ROOT TECHNOLOGY CO., LTD.,
Petitioner,

v.

CHIARO TECHNOLOGY LTD.,
Patent Owner.

IPR2024-01296
U.S. Patent No. 11,413,380

**PATENT OWNER'S UNOPPOSED MOTION FOR
WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

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

Pursuant to 37 C.F.R. § 42.10, Patent Owner respectfully requests that the Board authorize withdrawal of lead counsel Earl Bright of WILLOW INNOVATIONS, INC., and backup counsel Graham C. Phero, Richard D. Collier III, and Tyler Drye of STERNE, KESSLER, GOLDSTEIN & FOX PLLC as its counsel. Furthermore, Patent Owner desires to substitute the following counsel from Greenberg Traurig LLP to represent it going forward in the proceeding: Heath Briggs, lead counsel, and Trenton Ward, Elana Araj, Benjamin Gilford, Emma Cohen, and Declan Stone-Murphy as backup counsel.

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

Patent Owner, Willow Blossom Holdco Limited, is a wholly owned subsidiary of Willow Innovations, Inc. (collectively, “Willow”). As a result of a UK equivalent of a US bankruptcy, certain assets of former patent owner, Chiaro Technology Limited, including the patent at issue in this IPR, were acquired by Willow Blossom Holdco Limited. Accordingly, Willow seeks to withdraw its current counsel and substitute with counsel from Greenberg Traurig, as indicated herein. The withdrawal will not cause any material prejudice to any party or any delay in any of the proceedings. *See* 35 U.S.C. § 316(b). Patent Owner’s new counsel meets the requirements of 37 C.F.R. § 42.10 as registered practitioners. For good cause, Patent Owner requests that the current designated counsel be deemed

withdrawn from the present proceeding, and new counsel be designated for Patent Owner.

III. PETITIONER DOES NOT OBJECT TO THE SUBSTITUTION

Petitioner has indicated it does not oppose the requested withdrawal and substitution of counsel for Patent Owner.

IV. CONCLUSION

Patent Owner respectfully requests that the Board grant its motion for withdrawal of counsel and permit substitution of counsel.

Date: May 9, 2025

Respectfully submitted,

/Heath J. Briggs/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S UNOPPOSED MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL** was served on May 9, 2025, via email directed to counsel of record for Petitioner at the following:

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Dated: May 9, 2025

By: /Heath J. Briggs/

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