UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,

Petitioner,

v.

FACETEC, INC.,

Patent Owner.

Case No. IPR2025-00108

Patent No. 11,693,938

PETITIONER'S UNOPPOSED MOTION TO WITHDRAW COUNSEL

EXHIBITS

Exhibit	Reference
1001	U.S. Patent No. 10,776,471 ("the '471 Patent")
1002	File History of the '471 Patent ("'471patent File History")
1003	Declaration of Dr. Chris Daft
1004	Dr. Chris Daft Curriculum Vitae
1005	U.S. Patent 8,437,513 ("Derakhshani")
1006	U.S. Patent Application Publication 2011/0299741 ("Zhang")
1007	U.S. Patent Application Publication 2002/0113884 ("Tanii")
1008	U.S. Patent Application Publication 2014/0028823 ("Tahk")
1009	U.S. Patent Application Publication 2004/0239799 ("Suzuki")
1010	U.S. Patent Application Publication 2010/0014720 ("Hoyos")
1011	U.S. Patent 9,077,891
1012	U.S. Patent 8,965,064
1013	Zhengyou Zhang et al., *A Robust Technique for Matching Two Uncalibrated Images Through the Recovery of the Unknown Epipolar Geometry*, Institut National De Recherche En Informatique Et En Automatique (May 1994)
1014	U.S. Patent Application Publication 2010/0158319
1015	U.S. Patent Application Publication 2007/0127787
1016	U.S. Patent Application Publication 2004/0036574
1017	Eugene Hect & Alfred Zajac, *Optics*, Addison-Wesley Publishing Co. (1974)
1018	Anil K. Jain et al., *Introduction to Biometrics*, Springer (2011)
1019	B. Honlinger & H.H. Nasse, *Distortion*, Zeiss (Oct. 2009)
1020	Hue and Hatchet, *What is the Focal Plane?*, https://hueandhatchet.com/what-is-the-focal-plane/
1021	*Introduction to Astronomy*, https://physics.weber.edu/palen/phsx1040/lectures/ldistcomp.html
1022	Daniel Baker, *Face distortion is not due to lens distortion*, (May 5,

Exhibit	Reference
	2012), https://bakerdh.wordpress.com/2012/05/05/face-distortion-is-not-due-to-lens-distortion/
1023	Richard Hartley & Andrew Zisserman, *Multiple View Geometry in Computer Vision*, Cambridge Univ. Press (2nd ed. 2011)
1024	Daniel Moreno & Gabriel Taubin, *Simple, Accurate, and Robust Projector-Camera Calibration*, Brown Univ., mesh.brown.edu/calibration/
1025	Serge Belongie, *CSE 252B: Computer Vision II, Lecture 4: Planar Scenes and Homography* (Apr. 7, 2004)
1026	Merriam-Webster's Collegiate Dictionary (11th ed. 2014)
1027	Laurenz Wiskott, *Face Recognition by Elastic Bunch Graph Matching* (1999)
1028	Axis Communications, *CCD and CMOS sensor technology: Technical White Paper* (2010)
1029	Jeff Meyer, *What is Depth of Field? How aperture, focal length and focus control sharpness*, Digital Camera World (July 17, 2013), https://prism.org.gg/wp-content/uploads/2016/07/Depth-of-Field.pdf
1030	Brian Klug, *Understanding Camera Optics & Smartphone Camera Trends, A Presentation by Brian Klug*, Anandtech (Feb. 22, 2013), https://www.anandtech.com/Show/Index/6777?cPage=2&all=False&sort=0&page=2&slug=understanding-camera-optics-smartphone-camera-trends
1031	*Portrait mode now available on iPhone 7 Plus with iOS 10.1*, Apple (Oct. 24, 2016)
1032	*The Timeline of Evolution of the Camera from the 1600s to 21st Century*, Capture.com (May 5, 2023), https://www.capture.com/blogs/insights/evolution-of-the-camera
1033	John Biggs, *A Nokia Camera Phone That's More Like a Camera With a Phone Attached*, The New York Times (Nov. 29, 2007), ttps://www.nytimes.com/2007/11/29/technology/personaltech/29phone.html
1034	U.S. Patent 7,412,081

Exhibit	Reference
1035	U.S. Patent 8,457,367
1036	U.S. Patent 8,260,008
1037	Zac Hall, *Over a decade of selfies, starting with iPhone 4*, 9to5Mac (July 1, 2021), https://9to5mac.com/2021/07/01/iphone-4-selfie-celebration/
1038	Duane C. Brown, *Decentering Distortion of Lenses*, Photogrammertic Engineering (1966)
1039	Complaint, *FaceTec, Inc. v. iProov Ltd.*, C.A. No. 2:21-cv-02252, ECF No. 1 (D.N.V. Dec. 28, 2021)
1040	First Amended Complaint, *FaceTec, Inc. v. iProov Ltd.*, C.A. No. 2:21-cv-02252, ECF No. 18 (D.N.V. Feb. 24, 2022)
1041	Minute Entry, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 38 (N.D. Cal. Sept. 18, 2024)
1042	Opposition to Motion to Intervene, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 40 (N.D. Cal. Sept. 30, 2024)
1043	Request for Voluntary Dismissal Without Prejudice, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 45 (N.D. Cal. Oct. 10, 2024)
1044	Opposition to Request for Voluntary Dismissal Without Prejudice, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 49 (N.D. Cal. Oct. 18, 2024)
1045	Reply in Support of Request for Voluntary Dismissal Without Prejudice, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 51 (N.D. Cal. Oct. 25, 2024)
1046	Complaint, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 1 (N.D. Cal. June 14, 2024)
1047	Motion to Intervene, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 36 (N.D. Cal. Sept. 16, 2024)
1048	Order Denying Motion to Voluntarily Dismiss Without Prejudice, *FaceTec, Inc. v. Jumio Corp.*, C.A. No. 24-cv-03623, ECF No. 52 (N.D. Cal. Nov. 1, 2024)
1049	Declaration of Jessica C. Kaiser

Exhibit	Reference
1050	Docket, FaceTec, Inc. v. Jumio Corp., C.A. No. 24-cv-03623 (N.D. Cal.)
1051	April 30, 2025 email from the Board authorizing the filing of this Motion to Withdraw

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(e), Petitioner, Jumio Corporation ("Jumio"), respectfully requests that the Board authorize the withdrawal of lead counsel and back-up counsel from Perkins Coie LLP, Jessica C. Kaiser (Reg. No. 58, 937), Jon R. Carter (Reg. No. 75,145), David Pekarek Krohn (Reg. No. 69,443), Grant Kinsel (previously identified as pro hac vice to be submitted), John C. Moulder (Reg. No. 70,490), Tyler Knox (Reg. No. 79,948), and Matthew Lembo (Reg. No. 75,633) (collectively "Perkins Counsel"). Jumio has already filed mandatory notices designating Alex S. Yap (Reg. No. 60,609) as lead counsel, and Mehran Arjomand (Reg. No.: 48,231), and Jean Nguyen (Reg. No. 71,051) as back-up counsel (collectively "Morrison Counsel"), and Jumio requests Morrison Counsel be designated accordingly following this withdrawal. The Board authorized the filing of the present motion in a April 30, 2025 email. EX1051.

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

Perkins Counsel was appointed by Jumio and identified as lead and back-up counsel for the present *inter partes* review. Jumio requests that the current designated lead and back-up counsel be allowed to withdraw from the proceeding and that the Morrison Counsel be designated as lead and back-up counsel. Morrison Counsel was identified as lead and back-up counsel in the April 28, 2025 Updated Power of Attorney

(Paper 8), and the Updated Mandatory Notices (Paper 9), and meets the requirements of 37 C.F.R. §42.10(c) for lead and back-up counsel.

No extensions of time will be sought by Morrison Counsel as a result of the proposed withdrawal. Accordingly, this withdrawal will not cause any delay in the proceeding or prejudice to the Patent Owner.

III. CONCLUSION

Petitioner respectfully requests that the Board grant its motion to authorize the withdrawal of counsel.

Respectfully submitted,

/ *Jessica Kaiser* /

Jessica Kaiser
Reg. No. 58,937
Attorney for Petitioner

PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, CO 80202-5255

Date: May 1, 2025

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copy of **PETITIONER'S UNOPPOSED MOTION TO WITHDRAW COUNSEL** was served electronically on May 1, 2025, in its entirety on the following counsel of record for Petitioner:

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Respectfully submitted,

/ *Jessica Kaiser* /

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Date: May 1, 2025