

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, Petitioner

v.

BRODTI INC.,
Patent Owner

Case IPR2025-00472
U.S. Patent No. 11,416,898

PATENT OWNER MOTION TO PROCEED WITHOUT
BACKUP COUNSEL 37 CFR 42.10(a)

Relief Requested

Patent Owner requests permission to proceed without Backup Counsel.

Governing Rules

37 CFR 42.10(a) provides as follows:

a) If a party is represented by counsel, the party must designate a lead counsel and at least one back-up counsel who can conduct business on behalf of the lead counsel. Lead counsel must be a registered practitioner. The Board may permit a party to proceed without back-up counsel upon a showing of good cause. A party may show good cause by demonstrating that it lacks the financial resources to retain both lead and back-up counsel.

Statement of Facts

1. Patent Owner, Brodti, Inc., meets the definition of USPTO small entity status as provided in 37 CFR §1.27.

2. Patent Owner does not have the budget at present for both lead counsel and backup counsel.

Conclusion

With reference to the foregoing, Patent Owner requests permission to proceed without Backup Counsel.

Respectfully submitted,

/J. Mark Konieczny/

J. Mark Konieczny
Reg. No. 47,715
Attorney for Patent Owner

Customer No. 160962
Stonebridge IP, PLLC
10432 Balls Ford Rd., Suite 300
Manassas, VA 20109

Phone: (703) 881-7718

Date: April 30, 2025

CERTIFICATE OF SERVICE (37 C.F.R. §42.6(e))

I certify that the above-captioned **PATENT OWNER MOTION TO PROCEED WITHOUT BACKUP COUNSEL** was served in its entirety on April 30, 2025, upon the following parties via electronic mail:

Heidi L. Keefe (Lead Counsel) hkeefe@cooley.com
Andrew C. Mace (Back-up Counsel)) amace@cooley.com
Mark R. Weinstein (*Pro Hac Vice*, Back-up Counsel)
mweinstein@cooley.com
Reuben Chen (*Pro Hac Vice*, Back-up Counsel)
rchen@cooley.com

COOLEY LLP

Respectfully submitted,

/J. Mark Konieczny/

J. Mark Konieczny

Reg. No. 47,715

Attorney for Patent Owner

Date: April 30, 2025

Stonebridge IP PLLC
10432 Balls Ford Rd STE 300
Manassas, VA 20109
(703) 881-7718