

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

BRODTI INC.,

Patent Owner.

Case No. IPR2025-00472

U.S. Patent No. 11,416,898 B2

**MOTION TO WITHDRAW AS ATTORNEY, SUBSTITUTE COUNSEL,
AND CHANGE CORRESPONDENCE ADDRESS**

Pursuant to 37 CFR § 11.116(b)(1) the undersigned move¹ to: (i) withdraw as Lead and Backup Counsel for Patent Owner; (ii) substitute counsel identified in Patent Owner's July 28, 2026 Updated Mandatory Notices; and (iii) change the Correspondence address to direct all future Correspondence to Patent Owner's new counsel:

Eric Zelepugas
Reg. No. 73,302
zelepugas@avantechlaw.com
Avantech Law
80 S 8th St, Suite 900
Minneapolis, MN, 55402

Petitioner does not oppose this motion.

Pursuant to 37 CFR § 11.116(b)(1), a Practitioner may withdraw from representing a client when the withdrawal can be accomplished without material adverse effect on the interests of the client. Here, Patent Owner has obtained replacement counsel that has: (i) communicated to the Director its intent to file a Request for Director Review of June 30, 2026 Final Written Decision; and (ii) obtained a one-week extension of time to do so from the Board. Ex. 3103. The undersigned certify that, prior to this, Patent Owner was given reasonable notice that the undersigned intended to withdraw, Patent Owner was provided all papers and property to which it was entitled, and Patent Owner was made aware of all

¹ Permission to file this Motion was granted by the Board's July 29, 2026 email.

upcoming due dates. Thus, there are no material adverse effects on the interests of Patent Owner related to the undersigned's withdrawal and Patent Owner is fully represented in this proceeding.

The undersigned therefore request the Board's permission to withdraw as Lead and Backup Counsel for Patent Owner, and to substitute counsel identified in Patent Owner's July 28, 2026 Updated Mandatory Notices.

Date: July 30, 2026

Respectfully,
SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Timothy Cremen/
Timothy Cremen (Reg. No. 50,855)
Lead Counsel for Patent Owner

/James Gatto/
James Gatto (Reg. No. 32,694)
Back-Up Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, a copy of the foregoing Motion To Withdraw As Attorney And Change Correspondence Address was served via email to all parties to this proceeding at the addresses indicated:

Heidi L. Keefe (hkeefe@cooley.com)

Andrew C. Mace (amace@cooley.com)

Mark R. Weinstein (mweinstein@cooley.com)

Reuben Chen (rchen@cooley.com)

Date: July 30, 2026

Respectfully,
SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Timothy Cremen/
Timothy Cremen (Reg. No. 50,855)
Attorney for Patent Owner