

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIKTOK INC.,
Petitioner

v.

DISTEFANO WEBSITE INNOVATIONS, LLC,
Patent Owner

PTAB Case No. IPR2025-01224

U.S. Reissued Patent No. 45,971

**PETITIONER'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 and the Board’s September 29, 2025, email authorization, TikTok Inc. (“Petitioner”) respectfully requests that the Board authorize withdrawal of Yar Chaikovsky of White & Case LLP as lead counsel and Bruce Yen and Ethan Plail of White & Case LLP as backup counsel, and appointment of Jaysen S. Chung of Gibson, Dunn & Crutcher LLP as lead counsel and Shuo J. Zhang of Gibson, Dunn & Crutcher LLP as backup counsel for Petitioner.

II. STATEMENT SHOWING GOOD CAUSE FOR THE REQUESTED RELIEF

On July 8, 2025, Petitioner filed the Petition in this action. The Petition included Petitioner’s Mandatory Notices under 37 C.F.R. § 42.8 appointing Yar Chaikovsky as lead counsel and Bruce Yen and Ethan Plail as backup counsel. Paper 1. For good cause, Petitioner requests that the designations of Yar Chaikovsky as lead counsel and Bruce Yen and Ethan Plail as backup counsel be withdrawn and that new counsel, Jaysen S. Chung of Gibson, Dunn & Crutcher LLP, be designated as lead counsel and Shuo J. Zhang, both of Gibson, Dunn & Crutcher LLP, be designated as backup counsel to represent Petitioner in this proceeding.

Petitioner’s new counsel meet the requirements of 37 C.F.R. § 42.10(c) as all are registered to practice before the United States Patent and Trademark Office.

Substitution and withdrawal of counsel is requested due to a change in representation of Petitioner. Petitioner has engaged the law firm of Gibson, Dunn & Crutcher, including the identified lead and backup counsel, to handle this matter going forward.

Granting this motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. *See* 35 U.S.C. § 316(b). Substitute counsel is fully prepared to assume responsibility for this matter, and Petitioner will continue to meet all deadlines and obligations in this proceeding without disruption.

III. PATENT OWNER AND PETITIONER'S COUNSEL DO NOT OBJECT TO THE WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Patent Owner has confirmed it does not oppose the requested withdrawal and substitution of new counsel for Petitioner. Petitioner's withdrawing counsel, Yar Chaikovsky, Bruce Yen, and Ethan Plail, consent to the substitution of counsel.

IV. CONCLUSION

Petitioner respectfully requests that the Board grant their motion and authorize withdrawal and substitution of counsel. Upon grant of this motion, new lead and backup counsel for Petitioner will promptly file Amended Mandatory Notices and an Updated Power of Attorney.

Dated: October 3, 2025

Respectfully Submitted,

/s/ Jaysen S. Chung

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Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on October 3, 2025, a true and correct copy of the foregoing motion was served electronically on Petitioner's lead and backup counsel at the following addresses:

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Dated: October 3, 2025

Respectfully Submitted,

/s/Josh Zhang

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