

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FEDEX CORPORATION and
FEDEX OFFICE AND PRINT SERVICES, INC.
Petitioners,

v.

VALTRUS INNOVATIONS LTD.
Patent Owner

Case No. **IPR2025-01490**

Patent No. 7,120,832

**PATENT OWNER'S UNOPPOSED MOTION TO WITHDRAW AND
SUBSTITUTE COUNSEL UNDER 37 C.F.R. § 11.116**

Pursuant to 37 C.F.R. §§ 11.116 and 42.10(e), Patent Owner respectfully requests that the Board authorize the withdrawal of attorneys Vincent J. Rubino, III (Reg. No. 68,594) and Peter Lambrianakos (Reg. No. 58,279), both with FABRICANT LLP, and permit the substitution of Richard J. Botos (Reg. No. 32,016) and Raymond B. Churchill, Jr. (Reg. No. 44,617), both with Botos Churchill IP Law, LLP, as lead counsel and backup counsel, respectively. Patent Owner has retained Botos Churchill IP Law, LLP for this Inter Partes Review (IPR). Mr. Botos and Mr. Churchill are registered practitioners, meet the requirements of 37 C.F.R. § 42.10, and are ready and able to take over representation in these proceedings. The withdrawal of FABRICANT LLP will not cause any material prejudice to any party or any delay in any proceedings. An updated Power of Attorney has been filed herewith. Mandatory Notices removing FABRICANT LLP and substituting Botos Churchill IP Law LLP, are attached to this petition as Exhibit A. Counsel for Petitioner has indicated that Petitioner will not oppose the withdrawal of the attorneys with FABRICANT LLP and does not oppose this motion.

October 29, 2025

By: /s/ Richard J. Botos/

Richard J. Botos (Reg. No. 32,016)
Substituting Lead Counsel for Patent
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By: /s/ Vincent J Rubino III /

Vincent J. Rubino, III (Reg. No. 68,594)
Withdrawing Lead Counsel for Patent
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IPR2025-01490
U.S. PATENT NO. 7,120,832

Exhibit A
(Patent Owner's Updated Mandatory Notices)

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VALTRUS INNOVATIONS LTD.

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IPR2025-01490

Patent No. 7,120,832

Patent Owner's Updated Mandatory Notices

Patent Owner Valtrus Innovations Ltd. (“Valtrus”) provides this updated Mandatory Notice, pursuant to 37 C.F.R. § 42.8(a)(3) to update its identification of related matters pursuant to 37 C.F.R. § 42.8(b)(2), and pursuant to 37 C.F.R. § 42.8(b)(3) to update its identification of counsel, and service information. Patent Owner removes lead counsel Vincent J. Rubino, III, and backup counsel Peter Lambrianakos and identifies new lead counsel and back up counsel.

I. 37 C.F.R § 42.8(b)(1) – REAL PARTY-IN-INTEREST

The real parties-in-interest are Valtrus Innovations Ltd. and Key Patent Innovations Ltd. (“KPI”). Valtrus is the assignee and owner of the ’832 Patent. Valtrus is a subsidiary of KPI. KPI is the beneficiary of a trust pursuant to which Valtrus owns and holds the ’832 Patent.

II. 37 C.F.R § 42.8(b)(2) – RELATED MATTERS

Patent Owner identifies the following related matters that would affect, or be affected by, a decision in this IPR:

- *Valtrus Innovations Ltd. et al v. FedEx Corporation et al*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv-00516-JRG (filed May 9, 2025);
- *Valtrus Innovations Ltd. et al v. NetApp, Inc.*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv-00517-JRG (filed May 9, 2025) (consolidated with Case No. 2:25-cv-00516-JRG);
- *NetApp, Inc. v. Valtrus Innovations Ltd. et al*, United States District Court for the Southern District of New York, Case No. 1:25-cv-06138 (filed July 25, 2025);

- *Valtrus Innovations Ltd. et al v. The Home Depot, Inc. et al*, United States District Court for the Eastern District of Texas, Case No. 2:25- cv- 00081-JRG (filed January 27, 2025);
- *Valtrus Innovations Ltd. et al v. Lenovo Group Limited et al*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv- 00080-JRG (filed January 27, 2025);
- *Starbucks Corporation v. Valtrus Innovations Ltd. et al*, United States District Court for the Western District of Washington, Case No. 2:25-cv- 01859 (filed September 25, 2025); and
- *Ex Parte* Reexamination Request No. 90/015,602, filed by NetApp, Inc., challenging the '832 Patent.

III. 37 C.F.R § 42.8(b)(3) – DISCLOSURE OF COUNSEL

Patent Owner designates the following counsel as Lead and Back-up
Counsel:

<i>Lead Counsel</i>	<i>Back-up Counsel</i>
Richard J. Botos (Reg. No. 32,016) BOTOS CHURCHILL IP LAW LLP 430 Mountain Avenue, Suite 401 New Providence, N.J. 07974 Tel. (908) 738-1772 Fax. (908) 320-4441 PTAB@bciplaw.com rbotos@bciplaw.com	Raymond B. Churchill, Jr. (Reg. No. 44,617) BOTOS CHURCHILL IP LAW LLP 430 Mountain Avenue, Suite 401 New Providence, N.J. 07974 Tel. (908) 738-1772 Fax. (908) 320-4441 PTAB@bciplaw.com rchurchill@bciplaw.com

IV. 37 C.F.R § 42.8(b)(4) – SERVICE INFORMATION

Patent Owner respectfully requests that all electronic correspondence be directed to Lead Counsel and Back-up Counsel at the addresses set forth above in Section III. In addition, Patent Owner consents to electronic service by email at the following address: PTAB@bciplaw.com.

Respectfully submitted,

Dated: October 29, 2025

By: /s/ Richard J. Botos/
Richard J. Botos (Reg. No. 32,016)
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New Providence, N.J. 07974

CERTIFICATE OF SERVICE

A copy of the foregoing Patent Owner's MOTION TO WITHDRAW
AND SUBSTITUTE COUNSEL with UPDATED MANDATORY
NOTICES has been served on Petitioner's counsel of record as follows:

Email: IPR39898-0052IP1@fr.com

Kenneth W. Darby, Jr.

David M. Hoffman

Kim Leung

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**Attorneys for FedEx Corporation and
FedEx Office and Print Services, Inc.**

October 29, 2025

By: /s/ Richard J. Botos/

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