

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RESIDEO TECHNOLOGIES, INC. and
CENTRAL SECURITY GROUP – NATIONWIDE, Inc.,
Petitioner,

v.

UBIQUITOUS CONNECTIVITY, LP
Patent Owner

Case IPR2019-01335
Case IPR2019-01609
Patent 8,064,935

**PATENT OWNER UBIQUITOUS CONNECTIVITY, LP'S 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, Patent Owner respectfully requests that the Board authorize withdrawal of James D. Stein and Andrew G. Strickland of Lee & Hayes, P.C. as its counsel, and that the Board appoint Cortney S. Alexander of Kent & Risley LLC as lead counsel and Daniel A. Kent of Kent & Risley LLC as backup counsel in this matter.

II. STATEMENT SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL AND SUBSTITUTION OF COUNSEL

On July 25, 2019, Patent Owner submitted its Mandatory Notices Under 37 C.F.R. §§ 42.8(a)(2) and 42.8(b), appointing James D. Stein and Andrew G. Strickland as its counsel in the above-captioned *inter partes* review. (Paper 3). For good cause, Patent Owner requests that the current designated counsel be deemed withdrawn from the present proceeding, and new counsel, Cortney S. Alexander and Daniel A. Kent be designated lead and back-up counsel, respectively, to represent Patent Owner in this proceeding.

Patent Owner's new counsel meet the requirements of 37 C.F.R. § 42.10 because lead counsel is a registered practitioner and back-up counsel will file a motion for *pro hac vice* recognition pursuant to 37 C.F.R. § 42.10(c).

In identifying and designating new counsel who are ready and able to take over the representation, reasonable steps have been taken to “avoid foreseeable prejudice to the rights of the client, including giving due notice to his or her client,

[and] allowing time for employment of another practitioner.” *See* 37 C.F.R.

§ 10.40(a). Further, Patent Owner believes that 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).

III. PETITIONER DOES NOT OBJECT TO THE SUBSTITUTION

Petitioners have indicated they do not oppose the requested withdrawal and substitution of counsel for Patent Owner.

IV. CONCLUSION

Patent Owner respectfully requests that the Board grant its motion to authorize withdrawal of counsel and permit substitution of counsel. Upon grant of this motion, new counsel for Patent Owner will promptly file Amended Patent Owner’s Mandatory Notices and a Substitute Power of Attorney.

Respectfully submitted,

March 24, 2020

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **PATENT OWNER**
UBIQUITOUS CONNECTIVITY, LP'S MOTION FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL is being served on March 24, 2020, via
email on the following counsel:

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DATED: March 24, 2020

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