

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SMIC, AMERICAS,

Petitioner,

v.

INNOVATIVE FOUNDRY TECHNOLOGIES LLC,

Patent Owner

---

Case No. IPR2020-01003

U.S. Patent No. 6,580,122

---

**PETITIONER'S MOTION TO WITHDRAW COUNSEL**

## **I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10(e), and as authorized by the Board in an email dated January 28, 2021, Petitioner SMIC, AMERICAS (“Petitioner”) respectfully requests that current lead counsel, Alex V. Chachkes, be allowed to withdraw as lead counsel.

Petitioner has conferred with counsel for Patent Owner, who does not oppose this Motion.

## **II. STATEMENT OF FACTS SUPPORTING WITHDRAWAL**

On January 25, 2021, counsel for Petitioner requested authorization from the Board to file this Motion. The Board provided Petitioner with authorization to file this Motion on January 28, 2021.

Alex Chachkes’ last day at Orrick will be January 31, 2021, at which time he will no longer represent Petitioner. As a result, it is appropriate to allow Mr. Chachkes to withdraw as lead counsel.

The new lead counsel Richard F. Martinelli and back-up counsel Yufeng Ma are authorized to conduct business on behalf of Petitioner and will remain in this proceeding. Accordingly, the withdrawal of Mr. Chachkes will not interfere with or delay this proceeding.

### III. CONCLUSION

Petitioner respectfully requests that the Board grant this Motion, and allow Alex V. Chachkes to withdraw as lead counsel.

Respectfully submitted by:

Date: January 29, 2021

/ Richard F. Martinelli /

Richard F. Martinelli, Reg. No. 52,003  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
51 West 52nd Street  
New York, NY 10019-6142  
Main: (212) 506-5000  
Direct: (212) 506-3702  
Fax: (212) 506-5151  
Email: RFMPTABDocket@orrick.com

*Counsel for Petitioner*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing was served by electronic mail on counsel of record for the Patent Owner as follows:

William Meunier, Reg. No. 41,193  
Michael Renaud, Reg. No. 44,299  
Adam S. Rizk, Reg. No. 66,867  
Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo, P.C.  
One Financial Center  
Boston, MA 02111  
[wameunier@mintz.com](mailto:wameunier@mintz.com)  
[mtrenaud@mintz.com](mailto:mtrenaud@mintz.com)  
[arizk@mintz.com](mailto:arizk@mintz.com)  
[IFT\\_IPRS@mintz.com](mailto:IFT_IPRS@mintz.com)

Respectfully submitted by:

Date: January 29, 2021

/ Richard F. Martinelli /

---

Richard F. Martinelli, Reg. No. 52,003  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
51 West 52nd Street  
New York, NY 10019-6142  
Main: (212) 506-5000  
Direct: (212) 506-3702  
Fax: (212) 506-5151  
Email: RFMPTABDocket@orrick.com

*Counsel for Petitioner*