

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN RONGLIDA TECHNOLOGY CO. LTD.

Petitioner,

v.

PATHWAY IP LLC

Patent Owner.

U.S. Patent No. 7,841,729

Case No. IPR2025-01231

**PETITIONER'S MOTION FOR WITHDRAWAL AND SUBSTITUTION
OF COUNSEL UNDER 37 C.F.R. § 42.10(e)**

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.10(e), Petitioner Shenzhen Ronglida Technology Co. Ltd. (“*Petitioner*”) respectfully moves for the withdrawal of Hasan A. Almashat of Dinsmore & Shohl LLP (“*Dinsmore*”) as Lead Counsel, and for the substitution of Raymond Y. Chan of Glacier Law LLP (“*Glacier*”) as the new Lead Counsel. Petitioner’s Motion is opposed by Patent Owner Pathway IP LLC (“*Patent Owner*”).

Petitioner requests that the Board update the service list for this proceeding to reflect this substitution. A new Power of Attorney is being filed concurrently with this Motion. Petitioner will update its Mandatory Notices to reflect the change in counsel once the Board approves Mr. Almashat’s withdrawal.

II. STATEMENT OF FACTS

1. On July 11, 2025, Petitioner filed the Petition for Inter Partes Review in this proceeding, designating Hasan A. Almashat of Dinsmore as Lead Counsel and Wei Wang of Glacier as Back-Up Counsel.
2. Petitioner has elected to transfer its representation fully to Glacier by engaging Raymond Y. Chan (Reg. No. 37,484) as Lead Counsel.
3. Petitioner has executed a new Power of Attorney appointing Raymond Y. Chan (Reg. No. 37,484) as Lead Counsel and retaining Wei Wang as Back-Up Counsel. *See* Ex. 1020 (Power of Attorney).
4. Mr. Chan is a registered practitioner and is prepared to assume the

duties of Lead Counsel immediately.

III. ARGUMENT

The Board has discretion to authorize the withdrawal and substitution of counsel. *See* 37 C.F.R. § 42.10(e). Here, the Board should grant the withdrawal and substitution since good cause exists and since the change will not result in delay or prejudice.

A. Good Cause Exists for the Substitution

A party is generally entitled to counsel of its choice. Petitioner has made a decision to fully transfer the handling of this matter to the Glacier firm (which is also representing Petitioner in the related District Court litigation). Petitioner has also revoked all former powers of attorney.

B. The Substitution Will Not Cause Delay or Prejudice

The requested substitution will not disrupt this proceeding or prejudice Patent Owner.

- No Schedule Change: Petitioner does not request any extension of time or alteration to the Scheduling Order. Mr. Chan has reviewed the record and is prepared to proceed according to the existing schedule.
- Continuity of Representation: Glacier's Mr. Wang, who is already of record as Back-Up Counsel, remains designated as Back-Up Counsel. His continued involvement ensures that Petitioner retains institutional

knowledge of the proceeding, further negating any risk of delay.

C. Patent Owner's Rationale for Opposing this Motion Is Meritless

Pursuant to the Board's July 18, 2025 Order, the parties conferred regarding this matter via e-mail on December 22, 2025. At that time, Patent Owner's counsel wrote that he was "concerned about a change in counsel while the real party in interest issue is unresolved." Shortly thereafter, counsel for the parties engaged in a telephonic meet-and-confer. During that call, counsel for Patent Owner intimated that the root of this concern is a distrust of the proposed substitute counsel. Counsel for Patent Owner further suggested that he wanted Dinsmore attorneys involved to help ensure that these proceedings moved forward in an ethical manner.

Making unfounded accusations against the integrity of opposing practitioners is both indecorous and not a valid legal basis for opposing a motion to withdraw. Mr. Chan is a registered practitioner in good standing, and Petitioner is entitled to engage him. Patent Owner has identified no concrete facts or evidence to justify its purported suspicions of his or his firm's handling of the real-party-in-interest issue. Opposing counsel cannot "veto" the participation of registered practitioners based on gut feelings.

Furthermore, the Glacier firm is already acting as lead counsel in parallel

District Court litigation.¹ This is the same litigation at the heart of Patent Owner's real-party-in-interest arguments. To the extent that Patent Owner has a concern about Petitioner's identification of the real parties in interest, opposing Dinsmore's withdrawal is a *non sequitur*. If it were Glacier moving to withdraw, then perhaps Patent Owner might have tried arguing that such a withdrawal could have the effect of obscuring the connection to the parallel District Court litigation. But that is not what is happening. Glacier is remaining in this IPR, and allowing Dinsmore to withdraw will have zero impact on either party's substantive position on the real-party-in-interest issue.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board grant this motion, authorize the withdrawal of Hasan A. Almashat, and recognize Raymond Y. Chan as Lead Counsel.

Dated: January 13, 2026

Respectfully submitted,

/Hasan A. Almashat/

Hasan A. Almashat

Reg. No. 79,166

DINSMORE & SHOHL LLP

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¹ As noted in the underlying Petition, the case is *Pathway IP, LLC v. The Individuals Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A to the Complaint*, No. 1:24-cv-05218 (N.D. Ill.).

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2026, a copy of the foregoing MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL UNDER 37 C.F.R. § 42.10(e) of Shenzhen Ronglida Technology Co. Ltd. were served electronically via email on Patent Owner's counsel:

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Dated: January 13, 2026

/Hasan A. Almashat/

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