

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SHENZHEN RONGLIDA TECHNOLOGY CO. LTD.

Petitioner,

v.

PATHWAY IP LLC

Patent Owner.

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

Case No. IPR2025-01231

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PATENT OWNER'S OPPOSITION TO MOTION FOR WITHDRAWAL

January 19, 2026

Patent Owner hereby responds to the motion by Hasan Almashat (“Attorney Almashat”) to withdraw from representing Petitioner (Paper 10). The Board authorized this response at Ex. 3001. “Counsel may not withdraw from a proceeding before the Board unless the Board authorizes such withdrawal.” 37 C.F.R. § 41.10(e).

On December 22, 2025, the PTAB instructed Petitioner “to reply to the real parties in interest issue raised in Patent Owner’s Preliminary Response.” *See* Paper 8, at p. 2. *Within hours*, Attorney Almashat’s associate emailed Patent Owner’s counsel and indicated that Attorney Almashat intended to withdraw. *See* Poplin Declaration filed herewith as Exhibit 2037 at ¶ 2, Exhibit A. The timing of this, at the very least, raises questions since there was no clear immediate need to withdraw. The timing at least provides the appearance that Attorney Almashat did not want to be on record addressing the real party in interest issue.

Then, in responding to the PTAB’s requirement for additional information, Petitioner failed to provide any evidence rebutting Patent Owner’s real party in interest argument. Instead, Petitioner tried to minimize Patent Owner’s extensive evidence<sup>1</sup> and Attorney Almashat made himself a witness by making certain representations to the PTAB that have no evidentiary support in the record. For example, Attorney Almashat stated, “no other entity funded or controlled the IPR.”

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<sup>1</sup> And in direct conflict with his prior position that “Extrinsic IP filings and past litigation are... irrelevant [for the RPI issue],” Paper 9, at p. 2, Attorney Almashat now argues that the prior litigation “is at the heart of Patent Owner’s real-party-in-interest arguments.” Paper 10, at p. 4. Both of those opposing positions can’t be true.

*See* Paper 9, at p. 2 (signed by Attorney Almashat). Patent Owner is now left with no avenue to examine the “facts” of record except through Attorney Almashat.

The USPTO’s signature requirements unambiguously apply to all post-grant patent challenges, including proceedings before the PTAB for both IPR and PGR proceedings. *See* 37 C.F.R. §§ 11.18, 42.11(b)-(c). Thus, Attorney Almashat was required to complete a reasonable inquiry and form a good-faith belief as to the statement’s accuracy. What Attorney Almashat knows about the funding and control of the IPR, as well as the inquiry that he undertook, is now at issue in this case and discovery directed to Attorney Almashat will be appropriate if this case moves forward.


Though Patent Owner has concerns about the reasons for Attorney Almashat’s withdrawal at this juncture of the case, it appears impractical for Attorney Almashat to continue as both a witness and Petitioner’s counsel. As such, Patent Owner respectfully requests that Attorney Almashat be allowed to withdraw under the following two conditions. First, Attorney Almashat should be required to expressly consent to the USPTO’s jurisdiction through the pendency of this case. Fairness and justice require Attorney Almashat to confirm he will not argue the USPTO lacks jurisdiction to require him to support his statements of fact under oath. And second, as Attorney Almashat has already made himself a fact witness, the Board should require him to provide a written certification stating: (i) whether any costs of this IPR, including attorney fees, were paid, reimbursed, or agreed to be reimbursed, at any time, by any non-party; and (ii) whether any agreement or understanding, whether written or oral, grants any non-party the right to review before filing,

approve, direct, or veto the filing of the Petition, the selection of grounds or arguments, or any settlement or disclaimer decision in this IPR.

Contrary to the assertions made in the Motion to Withdraw (Paper 10), Patent Owner does not “distrust” the Glacier firm and did not question the integrity of the attorneys in the Glacier firm. But Patent Owner does mistrust Petitioner, at least for the reasons set forth in Patent Owner’s real-party-in-interest argument in Paper 7. And Petitioner did not provide any evidence to alleviate Patent Owner’s concerns. Instead, *Attorney Almashat* – not any of the Glacier attorneys – has made factual representations that are not supported by any evidence of record, and there will be no way to examine the basis for those statements and the inquiry that he conducted if he is allowed to simply disappear into the night in a way that leaves Patent Owner no recourse in this case.

Dated: January 19, 2026

Respectfully Submitted,

  
/s/ Justin Poplin

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## Certificate of Service

The undersigned hereby certifies that on January 19, 2026, a copy of the foregoing PATENT OWNER'S OPPOSITION TO MOTION FOR WITHDRAWAL, including the Poplin Declaration filed as Exhibit 2037, was served electronically via email on:

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Date: January 19, 2026

/s/   
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