

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

MOBILEMEDIA IDEAS, LLC

Plaintiff,

v.

APPLE INC.

Defendant.

Civil Action No. 10-258-SLR

JURY TRIAL DEMANDED

UNOPPOSED MOTION TO SUBSTITUTE PARTY AND COUNSEL

On March 27, 2017, MobileMedia Ideas, LLC (“MMI”) transferred and assigned its patent portfolio to Ironworks Patents LLC (“Ironworks”), which now owns the rights and title to the patents-in-suit. Ironworks has the exclusive right to sue and recover damages for infringement of the patents-in-suit. Pursuant to Federal Rule of Civil Procedure 25(c), MMI and Ironworks therefore seek an order permitting MMI to withdraw as plaintiff in the case and allowing the substitution of Ironworks as the plaintiff.

Ironworks also seeks an order permitting MMI’s current counsel of record to withdraw and allowing the substitution of counsel for Ironworks. Anthony C. Coles, Kenneth Rubenstein, Kimberly A. Mottley, Laura E. Stafford, Safraz W. Ishmael, Steven M. Bauer and William D. Dalsen of Proskauer are currently counsel of record for MMI and seek to withdraw from the litigation. Ironworks moves to substitute David Berten and Alison Richards from Global IP Law Group LLC as counsel for Ironworks. Mr. Berten and Ms. Richards plan to file formal appearances and pro hac vice motions upon the granting of this motion.

Delaware counsel Jack B. Blumenfeld, Jeremy A. Tigan, and Rodger Dallery Smith, II from Morris, Nichols, Arsht & Tunnell LLP are currently counsel of record for MMI and seek to

withdraw from the litigation. Ironworks moves to substitute attorneys from Farnan LLP as Delaware counsel for Ironworks, including Michael J. Farnan.

This withdrawal and substitution of counsel is not sought for the purpose of delay, but rather to allow the holder of the rights and title to the asserted patents, Ironworks, its choice of counsel.

Counsel for Ironworks, Alison Richards, has conferred with Apple's counsel, Joseph Mueller, and Apple has agreed to not oppose this motion.

FOR THESE REASONS, Ironworks respectfully requests that this motion be granted allowing the substitution of Ironworks as the plaintiff in this litigation and that the attorneys from Proskauer and Morris, Nichols be withdrawn as counsel of record and the attorneys from Global IP Law Group LLC and Farnan LLP be substituted on Ironworks' behalf.

Dated: April 17, 2017

Respectfully submitted,

Of Counsel:

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