

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIBERTY MUTUAL INSURANCE CO.
Petitioner

v.

PROGRESSIVE CASUALTY INSURANCE CO.
Patent Owner

Case CBM2012-00002
Patent 6,064,970

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

In view of the initial conference to be held on February 25, 2013,
Progressive Casualty Insurance Co. (“Patent Owner”) hereby files and serves the
following list of proposed motions:

I. CONTINGENT MOTION UNDER 37 C.F.R. § 42.221 TO AMEND

Patent Owner may move to amend one or more of the involved claims of the
‘970 patent. Any such claim amendments will be made to respond to one or more
of the grounds of unpatentability involved in the trial, and will not enlarge the
scope of the claims of the ‘970 patent (37 C.F.R. § 42.221(a)(2)(i)) or introduce
new matter (37 C.F.R. § 42.221(a)(2)(ii)).

Respectfully submitted,

JONES DAY

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February 21, 2013

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Patent Owner's PATENT OWNER'S LIST OF PROPOSED MOTIONS was served on February 21, 2013, by causing it to be sent by email to counsel for Petitioner at the following email addresses:

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