

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner

v.

SMARTFLASH LLC,  
Patent Owner

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Case CBM2015-00015  
Patent 8,118,221 B2

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**PETITIONER'S PROPOSED SCHEDULE**

Concurrent with the filing of the petition in the present matter, Petitioner filed a Motion for Joinder or, in the Alternative, for Coordination of Schedule (Paper 3), seeking to join, or at minimum coordinate, the present proceeding and CBM2014-00102, which also concerns U.S. Patent No. 8,118,221. As indicated in that motion, and consistent with guidance provided by the Board on October 29, 2014, during the initial conference call in *Apple Inc. v. Smartflash LLC*, CBM2014-00102, Paper 12 at 2, counsel for Petitioner has conferred with counsel for Patent Owner regarding a proposed schedule, but agreement was not reached. Accordingly, Petitioner provides below Petitioner's proposed schedule for joined proceedings, and an alternative proposal for a coordinated schedule if joinder is not granted.

	<b>Current Schedule in CBM2014-00102, -00106, -00108, -00112</b>	<b>Petitioner's Proposal for Schedule with Joinder</b>	<b>Petitioner's Alternative Proposal for Coordinated Schedule (CBM2015-00015)</b>
<p><b>Due Date 1</b></p> <p>Patent owner's response to the petition</p> <p>Patent owner's motion to amend the patent</p>	Dec. 22, 2014	March 2, 2015 (assuming institution decision circa Jan. 9, 2015)	March 2, 2015 (assuming institution decision circa Jan. 9, 2015)
<p><b>Due Date 2</b></p> <p>Petitioner's reply to patent owner's response to petition</p> <p>Petitioner's opposition to motion to amend</p>	March 16, 2015	April 20, 2015	April 6, 2015
<p><b>Due Date 3</b></p> <p>Patent owner's reply to petitioner's opposition to motion to amend</p>	April 14, 2015	May 18, 2015	May 4, 2015
<p><b>Due Date 4</b></p> <p>Motion for observation regarding cross-examination of reply witness</p> <p>Motion to exclude evidence</p> <p>Request for oral argument</p>	May 5, 2015	June 8, 2015	May 25, 2015

<b>Due Date 5</b> Response to observation Opposition to motion to exclude	May 19, 2015	June 15, 2015	June 1, 2015
<b>Due Date 6</b> Reply to opposition to motion to exclude	May 26, 2015	June 19, 2015	June 5, 2015
<b>Due Date 7</b> Oral argument (if requested)	June 9, 2015	June 23, 2015	June 9, 2015

Respectfully submitted,

November 6, 2014

By: J. Steven Baughman/  
J. Steven Baughman (Lead Counsel)  
Megan Raymond  
**ROPES & GRAY LLP**

Ching-Lee Fukuda (Backup Counsel)  
**ROPES & GRAY LLP**

Mailing address for all PTAB correspondence: **ROPES & GRAY LLP**,  
IPRM – Floor 43, Prudential Tower, 800 Boylston Street, Boston, MA 02199-3600  
*Attorneys for Petitioner Apple Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of PETITIONER'S PROPOSED SCHEDULE was served on November 6, 2014, by causing the aforementioned document to be deposited in the United States Postal Service as Express Mail postage pre-paid in an envelope addressed to:

Michael R. Casey  
J. Scott Davidson  
DAVIDSON BERQUIST JACKSON & GOWDEY LLP  
4300 Wilson Blvd., 7th Floor  
Arlington, VA 22203

(Label No. EF 070 057 744 US)

*Attorneys for Patent Owner Smartflash LLC*

s/Darrell W. Stark  
Darrell W. Stark

**ROPES & GRAY LLP**