## Case CBM2015-00032 Patent 8,336,772 B2 UNITED STATES PATENT AND TRADEMARK OFFICE

#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

### APPLE INC., Petitioner

v.

SMARTFLASH LLC, Patent Owner

Case CBM2015-00032 Patent 8,336,772 B2

Before the Honorable JENNIFER S. BISK, RAMA G. ELLURU, GREGG I. ANDERSON, and MATTHEW R. CLEMENTS, *Administrative Patent Judges*.

### PETITIONER'S LIST OF PROPOSED MOTIONS

Further to the Board's Scheduling Order (Paper 12) setting an Initial Conference Call for June 29, 2015, and directing the parties to pages 48,765-66 of the Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,765-66 (Aug. 14, 2012), Petitioner Apple Inc. ("Apple") hereby submits a list of proposed motions presently contemplated by Petitioner and which Petitioner intends to raise during the Initial Conference Call:

• Potential additional motion(s) for *Pro Hac Vice* Admission pursuant to Rule 42.10(c) (as previously authorized by the Board in Paper 3); and

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> Motion to expedite the schedule in this trial to permit synchronization with Due Dates 4 through 7 in the schedule set for CBM2015-00015, CBM2015-00016, CBM2015-00017, and CBM2015-00018.

Although these are, as noted, the motions presently contemplated by Petitioner, it

is Petitioner's understanding that, as stated in the Trial Practice Guide (at 48,765)

"[s]ubmission of [this] list would not preclude the filing of additional motions not

contained in the list."

Respectfully submitted,

By:/J. Steven Baughman/

J. Steven Baughman (Lead Counsel) Reg. No. 47,414 Megan F. Raymond Reg. No. 72,997 **ROPES & GRAY LLP** One Metro Center, 700 12<sup>th</sup> St. – Ste. 900 Washington, DC 20005-3948 P: 202-508-4606 / F: 202-383-8371 steven.baughman@ropesgray.com megan.raymond@ropesgray.com June 25, 2015

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Attorneys for Petitioner Apple Inc.

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of PETITIONER'S LIST OF

PROPOSED MOTIONS was served on June 25, 2015, to the following Counsel

for Patent Owner via e-mail, pursuant to the parties' agreement concerning service:

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Attorneys for Patent Owner Smartflash LLC

<u>/s/ Megan Raymond</u> Megan F. Raymond

# **ROPES & GRAY LLP**