Case CBM2015-00033 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 CBM2015-00033 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



Case CBM2015-00033 Patent 8,336,772 B2

> • 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,

June 25, 2015

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 12th St. – Ste.

900

Washington, DC 20005-3948

P: 202-508-4606 / F: 202-383-8371 steven.baughman@ropesgray.com

megan.raymond@ropesgray.com

Ching-Lee Fukuda (Backup Counsel)

Reg. No. 44,334

ROPES & GRAY LLP

1211 Avenue of the Americas

New York, NY 10036

P: 212-596-9336 /F: 212-596-9000

ching-lee.fukuda@ropesgray.com

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 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:

Michael R. Casey
J. Scott Davidson
DAVIDSON BERQUIST JACKSON & GOWDEY LLP
8300 Greensboro Dr., Suite 500
McLean, VA 22102
Telephone: (571) 765-7700
Facsimile: (571) 765-7200

mcasey@dbjg.com jsd@dbjg.com docket@dbjg.com

Attorneys for Patent Owner Smartflash LLC

/s/ Megan Raymond Megan F. Raymond

ROPES & GRAY LLP

