

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner

v.

CONTENTGUARD HOLDINGS, INC.
Patent Owner

Case CBM 2015-00160

U.S. Patent 7,774,280

Filed October 4, 2004

Issued August 10, 2010

Title: SYSTEM AND METHOD FOR MANAGING TRANSFER
OF RIGHTS USING SHARED STATE VARIABLES

Attorney Docket No. 20318-134361

Customer No: 22242

**CONTENTGUARD HOLDINGS INC.'S MANDATORY
NOTICES PURSUANT TO 37 C.F.R. §42.8(a)(2)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

Patent Owner ContentGuard Holdings, Inc. hereby files its Mandatory Notices for the above-captioned proceeding. Patent Owner respectfully requests that the Board accept its delayed filing of this notice in view of the fact that neither its undersigned counsel (who is also counsel in CBM2015-00040, the proceeding with which Petitioner requests this proceeding be joined), nor Patent Owner's pertinent inside counsel, received notice of the instant petition until August 20, 2015, when the undersigned counsel received an e-mail from Board Paralegal Operations Manager Maria Vignone, which requested that Patent Owner file its mandatory notice in this proceeding.

I. Real Parties-In-Interest Under 37 C.F.R. §42.8(b)(1)

The real parties-in-interest are ContentGuard Holdings, Inc. and Pendrell Corporation.

II. Related Matters Under 37 C.F.R. §42.8(b)(2)

Patent Owner notes the following matters that may affect or be affected by a decision in this proceeding:

A. Proceedings Before the USPTO Involving Related Patents

| Patent No. | Case No. | Petitioner |
|------------|---------------------------------------|------------|
| 7,774,280 | IPR2015-00351 (Institution denied) | Apple Inc. |
| 7,774,280 | IPR2015-00352 (Institution denied) | Apple Inc. |
| 7,774,280 | IPR2015-00353 (Institution denied) | Apple Inc. |

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|-----------|---------------------------------------|-------------|
| 7,774,280 | IPR2015-00354 (Institution denied) | Apple Inc. |
| 7,774,280 | CBM2015-00040 (Instituted) | Google Inc. |
| 8,001,053 | CBM2015-00043 (Institution denied) | Google Inc. |
| 8,001,053 | IPR2015-00355 (Institution denied) | Apple Inc. |
| 8,001,053 | IPR2015-00356 (Institution denied) | Apple Inc. |
| 8,001,053 | IPR2015-00357 (Institution denied) | Apple Inc. |
| 8,001,053 | IPR2015-00358 (Institution denied) | Apple Inc. |

B. Litigations Involving the Involved Patent

The '280 patent is at issue in:

- *ContentGuard Holdings Inc. v. Amazon.com, Inc., et al.*, No. 13-cv-01112 (Dec. 18, 2013 E.D. Tex.);
- *Google Inc. v. ContentGuard Holdings Inc.*, No. 14-cv-0498 (Jan. 31, 2014 N.D. Cal.);
- *ContentGuard Holdings Inc. v. Google Inc.*, No. 14-cv-0061 (Feb. 2, 2014 E.D. Tex.); and
- *ContentGuard Holdings, Inc. v. DirecTV, LLC*, No. 2:15-cv-00128 (E.D. Tex.).

C. Related Administrative Matters

Pending U.S. patent application 13/296,599 is a continuation of U.S. Patent No. 8,078,542, which is a continuation of the involved patent.

III. Lead and Back-Up Counsel Under 37 C.F.R. §42.8(b)(3)

Patent Owner identifies lead and back-up counsel as follows:

A. Lead Counsel

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IV. Service Information Under 37 C.F.R. §42.8(b)(4)

Please address all correspondence to the lead and back-up counsel as shown above. Patent Owner consents to electronic service by email at the email addresses above.

Respectfully submitted,

FITCH EVEN TABIN & FLANNERY, LLP

Dated: August 21, 2015

By: /Timothy P. Maloney/

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