

Filed on behalf of Proxyconn, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner

v.

Patent of PROXYCONN, INC.
Patent Owner

Case IPR2012-00026
Patent 6,757,717

PROXYCONN, INC.'S MOTION FOR ADDITIONAL DISCOVERY
PURSUANT TO 37 CFR 42.51(b)(2)

Pursuant to the Order entered by the Patent Trial and Appeal Board on February 11, 2013, Patent Owner, Proxyconn, Inc. hereby moves the Board for additional discovery, pursuant to 37 CFR 42.51(b)(2), that would allow Proxyconn to serve thirteen requests for the production of documents that relate to the commercial success of the accused Microsoft product. As discussed more fully in the accompanying memorandum, the grant of this motion is in the interests of justice because Proxyconn submits a specific factual reason to justify the needed discovery; Proxyconn was diligent in seeking this discovery; and there is no undue prejudice to Microsoft in responding to the targeted requests.

Respectfully submitted by:

Dated: February 18, 2013

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

It is hereby certified that on this 18th day of February, 2013, a copy of the foregoing document was served via Federal Express upon the following:

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