

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KYOCERA CORPORATION, and
MOTOROLA MOBILITY LLC
Petitioners,

v.

SOFTVIEW LLC
Patent Owner.

**PETITIONERS' NOTICE OF FILING OF SUPPLEMENTAL
EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(2)**

CASES : IPR2013-00007

CASES : IPR2013-00256

Patent Nos. : 7,461,353

Pursuant to 37 C.F.R. 42.64(b)(2), in response to Patent Owner's Objections to Evidence Pursuant to 37 C.F.R. § 42.64 ("Patent Owner's Objections"), Petitioners Kyocera Corporation and Motorola Mobility, Inc. hereby submit supplemental evidence in the form of: (1) a Supplemental Reply Declaration of Jack D. Grimes, Ph.D. (PX 1052) ("Supplemental Grimes Reply Declaration"); (2) a Supplemental Declaration of Richard J. Lutz, Ph.D. (PX 1053) ("Supplemental Lutz Declaration"); and (3) revised exhibit PX 1032, which includes pages that Patent Owner advised Petitioners were relevant and should be included.

The Supplemental Grimes Reply Declaration is submitted in response to Section II.A of Patent Owner's Objections. In particular, the Supplemental Grimes Declaration rebuts Patent Owner's Objections that Dr. Grimes belatedly advances new claim construction positions, that Dr. Grimes proposes new theories of obviousness based on combinations of references with the Zaurus references, that Dr. Grimes raises new invalidity theories based on new prior art references, that Dr. Grimes raises new and belated evidence, and that Dr. Grimes advances irrelevant testimony.

The Supplemental Lutz Declaration is submitted in response to Section II.E of Patent Owner's Objections. In particular, the Supplemental Lutz Declaration rebuts Patent Owner's Objections that Dr. Lutz's opinions

are based on insufficient facts and data, and are the product of unreliable principles and methods unreliably applied to the facts of this case.

Petitioners put Patent Owner on notice that several statements in Patent Owners' objections fail to comply with 37 C.F.R. 42.64(b)(1) because they fail to "identify the grounds for the objection with sufficient particularity to allow correction in the form of supplemental evidence."

Petitioners reserve all responses to Patent Owners' objections, and will present them in response to a motion to exclude evidence, if filed by the Patent Owner.

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

Date: October 15, 2013

BY: /Richard P. Bauer/
Richard P. Bauer (Reg. No. 31,588)

KATTEN MUCHIN ROSENMAN LLP
2900 K Street NW - Suite 200

Washington, DC 20007-5118
Richard.Bauer@kattenlaw.com

Eric C. Cohen (Reg. No. 27,429)
Michael S. Dorfman (Reg. No. 46,669)
Michael S. Tomsa (Reg. No. 64,264)
KATTEN MUCHIN ROSENMAN LLP
525 W. Monroe Street
Chicago, IL 60661-3693
Eric.Cohen@kattenlaw.com
Michael.Dorfman@kattenlaw.com
Michael.Tomsa@kattenlaw.com
Attorneys for Petitioner Kyocera Corp.

John C. Alemanni (Reg. No. 47,384)
KILPATRICK TOWNSEND & STOCKTON, LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400
JAlemanni@KilpatrickTownsend.com

David A. Reed (Reg. No. 61,226)
KILPATRICK TOWNSEND & STOCKTON, LLP
Suite 2800, 1100 Peachtree Street NE
Atlanta, GA, 30309-4528
DAReed@KilpatrickTownsend.com
*Attorneys for Petitioner Motorola
Mobility LLC*

