

Filed on behalf of ABB, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ABB, INC.
Petitioner

v.

ROY-G-BIV CORPORATION
Patent Owner

Case IPR2013-00062
Case IPR2013-00282
Patent 6,516,236 B1

PETITIONER'S NOTICE OF FILING
SUPPLEMENTAL INFORMATION (37 C.F.R. § 42.123)

LIST OF EXHIBITS

Previously Filed

- 1001 David W. Brown et al., U.S. Patent No. 6,516,236, “Motion Control Systems”, Issued February 4, 2003.
- 1002 Gertz, M.W., *A Visual Programming Environment for Real-Time Control Systems*. Ph.D. dissertation, Carnegie Mellon University, Nov. 22, 1994 (“Gertz”).
- 1003 Microsoft Corporation, *WOSA (Windows Open Services Architecture) Extensions for Financial Services*, April 14, 1994 (“WOSA/XFS”).
- 1004 Stewart, D.B., *Real-Time Software Design and Analysis of Reconfigurable Multi-Sensor Based Systems*. Ph.D. dissertation, Carnegie Mellon University, April 1, 1994 (“Stewart”).
- 1005 Morrow, J. Dan; Nelson, Bradley J.; and Khosla, Pradeep, *Vision and Force Driven Sensorimotor Primitives for Robotic Assembly Skills*. Institute for Software Research, paper 574, January 1, 1995 (“Morrow”).
- 1006 Microsoft Press, *MS Windows 3.1 Device Driver Adaptation Guide*, © 1991, Chs. 1-2, 4, 10-12 (“DDAG”).
- 1007 Hall, Marty and Mayfield, James, *Improving the Performance of AI Software: Payoffs and Pitfalls in Using Automatic Memoization*. Proceedings of Sixth International Symposium on Artificial Intelligence, Monterrey, Mexico, September 1993 (“Hall”).
- 1008 Michael Wright et al., U.S. Patent No. 5,453,933, “CNC Control System,” issued Sept. 26, 1995 (“Wright”).
- 1009 David B. Stewart et al., *The Chimera II Real-Time Operating System for Advanced Sensor-Based Control Applications*. Institute for Software Research, paper 613, January 1, 1992 (“Chimera II”).
- 1010 Cashin, J., *WOSA: Windows Open Services Architecture*, January 11, 1994 (“Cashin”).

- 1011 Kevin Holloway, *Motion Software Heads Toward Friendlier User Environments*, published at www.roygbiv.com/XMCreview1.htm, January 21, 1997 (“Holloway”).
- 1012 Plaintiff Roy-G-Biv Corporation’s Opening Markman Brief, *Roy-G-Biv Corp., v. Fanuc Ltd., et al.* (E.D.Tex., Nov. 21, 2008) (CASE NO. 2:07-CV-0418-DF-CE) (“RGB Markman Brief”).
- 1013 Claim Construction Order, *Roy-G-Biv Corp., v. Fanuc Ltd., et al.* (E.D.Tex., Nov. 21, 2008) (CASE NO. 2:07-CV-0418-DF-CE) (“Markman Order”).
- 1014 U.S. Patent No. 5,881,230, “Method and System for Remote Automation of Object Oriented Applications,” issued Mar. 9, 1999 (“Christensen”).
- 1015 U.S. Patent No. 5,691,897, “Motion Control Systems,” issued Nov. 25, 1997 (“the ’897 Patent”).
- 1016 U.S. Patent No. 5,867,385, “Motion Control Systems,” issued Feb. 2, 1999 (“the 385 Patent”).
- 1017 Jacob Tal, *Step by Step Design of Motion Control Systems*, Chapters 9 and 10, Galil Motion Control, Inc., 1994 (“Tal”).
- 1018 Hewlett Packard, *Matrix/Plotter Programming*, HP 9831A Desktop Computer, 1977 (“HP77”).
- 1019 Hewlett Packard, *Interface and Programming Manual*, HP 7550 Graphics Plotter, 3rd ed., 1986 (“HP86”).
- 1020 Hewlett Packard, *User’s Guide*, HP 7550 Plus Plotter, 1990 (“HP90”).
- 1021 Martin L. Stone et al., *An Intelligent Plotter for High-Throughput, Unattended Operation*, *Hewlett-Packard Journal*, April, 1985 (“HP85”).
- 1022 Preliminary Infringement Contentions, *ROY-G-BIV Corp., v. ABB, Ltd. et al.* (E.D.Tex., Sept. 14, 2012) (CASE NO. 6:11-CV-00622-LED) (“RGB PIC”).
- 1023 Preliminary Infringement Contentions, Exhibit B, *ROY-G-BIV Corp., v. ABB, Ltd. et al.* (E.D.Tex., Sept. 14, 2012) (CASE NO. 6:11-CV-00622-

LED) (“RGB PIC, Ex. B”).

- 1024 U.S. Patent No. 6,516,236, Appendix A.
- 1025 Excerpt of RGB Design Document - 3.2 Project Evolution With Compumotor Influence.
- 1026 RGB’s April 26, 2013 Letter Brief to the District Court re Indefiniteness Dkt #150-1.
- 1027 RGB Corporation’s Opening Markman Brief, ROY-G-BIV Corp., v. ABB, Ltd. et al. (E.D.Tex., Apr. 26, 2013) (CASE NO. 6:11-CV-00622-LED) (“RGB Opening Markman Brief”).
- 1028 Defendants’ Joint Claim Construction Brief, ROY-G-BIV Corp., v. ABB, Ltd. et al. (E.D.Tex., May 10, 2013) (CASE NO. 6:11-CV-00622-LED) (“Defs. JCCB”).
- 1029 RGB Corporation’s Reply Markman Brief, ROY-G-BIV Corp., v. ABB, Ltd. et al. (E.D.Tex., May 24, 2013) (CASE NO. 6:11-CV-00622-LED) (“RGB Reply Markman Brief”).

Currently Filed

- 1030 Claim Construction Memorandum Opinion and Order, ROY-G-BIV Corp., v. ABB, Ltd. et al. (E.D.Tex., July 25, 2013) (CASE NO. 6:11-CV-00622-LED) (“Markman Memorandum Order”).

PETITIONER'S NOTICE OF FILING SUPPLEMENTAL INFORMATION

In the initial conference call held on June 27, 2013 and paper 26 in the related trial in IPR2013-00063, the Board granted petitioner's request to file supplemental information, including the Markman briefs and preliminary and final orders on claim construction from the concurrent litigation. The Markman Briefs were previously filed as exhibits 1027-1029 with petitioner's motion to file supplemental information in this proceeding. ABB hereby submits the following document as exhibit 1030:

1. Claim Construction Memorandum Opinion and Order, ROY-G-BIV Corp., v. ABB, Ltd. et al. (E.D.Tex., July 25, 2013) (CASE NO. 6:11-CV-00622-LED).

Although the district court in the concurrent litigation provided the parties with preliminary constructions immediately prior to the Markman hearing, these preliminary constructions do not appear to have been made a part of the record in that related matter and thus are not submitted here.

Dated: August 30, 2013

Respectfully submitted,

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