

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVAYA INC.
Petitioner

v.

NETWORK-1 SECURITY SOLUTIONS, INC.
Patent Owner

CASE IPR2013-00071
U.S. Patent No. 6,218,930

Before the honorable Jameson Lee, Joni Y. Chang, and Justin T. Arbes

**PETITIONER'S LIST OF PROPOSED MOTIONS
PRIOR TO INITIAL CONFERENCE CALL**

An initial conference call is scheduled for 2:00 PM Eastern Time on Tuesday, June 18, 2013. Pursuant to the Decision of the Board to institute *inter partes* review (Paper 18) and Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (Aug. 14, 2012), Petitioner identifies the following motions that it may file during the trial, depending upon positions taken by Patent Owner:

- Motions Requesting Discovery Pursuant to 37 CFR § 42.51(b);
- Motions to Submit Supplemental Information Pursuant to 37 CFR §§ 42.64(b)(2), 42.123;
- Motions to Exclude Evidence Pursuant to 37 CFR § 42.64(c); and
- Motions for Observation on Cross-Examination Pursuant to 37 CFR § 42.20.

To the extent necessary – given that Petitioner is not aware of what amendments, remarks, and evidence Patent Owner may present – Petitioner reserves the right to request permission to file additional motions as appropriate.

Respectfully submitted,

June 14, 2013

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

I hereby certify that on this 14th day of June 2013, a true and correct copy of the foregoing “PETITIONER’S LIST OF PROPOSED MOTIONS PRIOR TO INITIAL CONFERENCE CALL” was served, in accordance with the parties’ electronic service agreement, by electronic mail upon the following lead and backup counsel of record for the Patent Owner:

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