BEFORE THE PATENT TRIAL AND APPEAL BOARD IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re: U.S. Patent No. 6,415,280

Patent Owners: PersonalWeb Technologies, LLC & Level 3 Communications

Petitioner: EMC Corporation & VMware, Inc.

Inventors: David A. Farber and Ronald D. Lachman

For: IDENTIFYING AND REQUESTING DATA IN NETWORK USING IDENTIFIERS WHCH ARE BASED ON CONTENTS OF DATA

* * * * * * * * * *

May 30, 2013

PATENT OWNER'S INITIAL LIST OF PROPOSED MOTIONS FOR DISCUSSION DURING INITIAL CONFERENCE CALL

An initial conference call is scheduled in this matter for Monday, June 3, 2013, at 2:00 pm. Patent Owner submits this initial listing of proposed motions which it may bring during this trial. This listing is without prejudice to Patent Owner's right to seek authorization to bring additional motions, or to decide not to bring motions as indicated, as circumstances may warrant.

 Motion for Modification of Scheduling Order – depending at least upon whether petitioner submits additional information and the nature of such additional information.

- 2. Motion for Discovery depending at least upon whether petitioner submits additional information and the nature of such additional information.
- 3. Motion to Exclude Under Rule 42.64.
- 4. Motion for Observations on Cross-Examination if applicable.
- 5. Motion to Seal regarding Confidential Information.
- 6. Motion for admission pro hac vice for one additional attorney.

Patent owner would also like to discuss how to coordinate discovery

between the six IPRs: 2013-00082, 00083, 00084, 00085, 00086, and 00087.

Patent owner also desires to file opposition(s), if appropriate, to motions

filed by petitioner as permitted under the Rules.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: /Joseph A. Rhoa/ Joseph A. Rhoa Reg. No. 37,515 Updeep (Mickey) S. Gill Reg. No. 37,334 Counsel for Patent Owner PersonalWeb

JAR:caj Nixon & Vanderhye, PC 901 North Glebe Road, 11th Floor Arlington, VA 22203-1808 Telephone: (703) 816-4000 Facsimile: (703) 816-4100

RM

CERTIFICATE OF SERVICE

I hereby certify service of the foregoing Patent Owner's Initial List of Proposed Motions for Discussion During Initial Conference Call to the following lead counsel for petitioner on May 30, 2013 via email (pursuant to agreement between the parties):

> Peter M. Dichiara WilmerHale 60 State Street Boston, MA 02109 (peter.dichiara@wilmerhale.com)

By: ____/Joseph A. Rhoa/

Joseph A. Rhoa Reg. No. 37,515

Δ