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Filed on behalf of EMC Corp. and VMWare, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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EMC Corporation and VMWare, Inc.,  
Petitioners

v.

Personal Web Technologies LLC,  
Patent Owner

U.S. Patent No. 6,415,280

IPR Case No. IPR2013-00083

**PETITIONERS' LIST OF PROPOSED MOTIONS**

## PETITIONERS' LIST OF PROPOSED MOTIONS

Further to the Decision of the Board to institute *inter partes* review on May 17, 2013, Petitioners provide the following list of proposed motions.

### I. Proposed Motions

1. Motion to Submit Supplemental Information under 37 C.F.R. § 42.123
2. Motion for admission *pro hac vice* for one additional counsel.
3. Motion for Observation on Cross-Examination - Contingent upon any reply witness proffered by Patent Owner. *Office Patent Trial Practice Guide*, 77 Fed. Reg. 48756, 48768 (August 14, 2012)
4. Motion to Exclude Evidence under 37 C.F.R. § 46.64 – Contingent upon evidence presented by Patent Owner.

Petitioners do not anticipate additional motions at this time. If the grounds of rejection are modified during this proceeding, Petitioners may request additional motions as appropriate. Petitioners expect that they will file Opposition(s) to Patent Owner's Motion(s) as permitted under the Rules and authorized by the Board.

Respectfully Submitted,

/David L. Cavanaugh/

David L. Cavanaugh

Registration No. 36,476

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 30, 2013, I caused a true and correct copy of the foregoing materials:

- PETITIONERS' LIST OF PROPOSED MOTIONS

to be served via email, previously agreed between the parties, on the following attorney of record:

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**Petitioners' List of Exhibits for *Inter Partes* Review**  
**Case No. IPR2013-00083 (U. S. Patent 6,415,280)**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
1001.	U.S. Patent No. 6,415,280
1002.	S. Browne et al., "Location-Independent Naming for Virtual Distributed Software Repositories," University of Tennessee Technical Report CS-95-278 (Feb. 1995)
1003.	Albert Langer, "Re: dl/describe (File descriptions)," post to the "alt.sources" newsgroup on August 7, 1991
1004.	F. Kantor, "The Frederick W. Kantor Contents-Signature System Version 1.22," FWKCS122.REF (August 10, 1993)
1005.	Woodhill et al., U.S. Patent No. 5,649,196, entitled "System and Method For Distributed Storage Management on Networked Computer Systems Using Binary Object Identifiers,"
1006.	S. Browne et al., "Location-Independent Naming for Virtual Distributed Software Repositories," <a href="http://www.netlib.org/utk/papers/lifn/main.html">http://www.netlib.org/utk/papers/lifn/main.html</a> (Nov. 11, 1994)
1007.	K. Moore et al., "An Architecture for Bulk File Distribution," Network Working Group Internet Draft (July 27, 1994)
1008.	Chart of Patent Family Members
1009.	Declaration of Dr. Douglas W. Clark, PH.D
1010.	Banisar et al., The Third CPSR Cryptography and Privacy Conference at 509 (1993)
1011.	G. D. Knott, Hashing functions, The Computer Journal (1975), vol. 3, no. 3, p. 265.

IPR Case No. IPR2013-00083  
U.S. Patent 6,415,280  
Petitioners' List of Proposed Motions

<u>Exhibit</u>	<u>Description</u>
1012.	R. Rivest, "The MD5 Message-Digest Algorithm," Internet RFC 1321 (Apr. 1992)
1013.	McGraw-Hill Dictionary of Scientific and Technical Terms, (4 <sup>th</sup> ed., 1989)
1014.	B. Kaliski, "A Survey of Encryption Standards," IEEE Micro (Dec. 1993)
1015.	Rabin, Fingerprinting by Random Polynomials, Center for Research in Computing Technology, Harvard University, Report TR-15-81
1016.	U. Manber, "Finding Similar Files in a Large File System", University of Arizona Technical Report (1994)
1017.	D.R. McGregor and J.A. Mariani 'Fingerprinting' – A Technique for File Identification and Maintenance, 12 Software Practice & Experience 1165 (1982)
1018.	T. Berners-Lee et al., "Uniform Resource Locators (URL)," Internet RFC 1738 (Dec. 1994)
1019.	U. S. Patent 6,415,280 Prosecution History, Response (August 22, 2001)
1020.	EP Pub. No. EP0826181A1 Prosecution History, Annex to the communication dated May 8, 2009
1021.	EP Pub. No. EP0826181A1 Prosecution History, Reply to communication from the Examining Division dated November 18, 2009
1022.	EP Pub. No. EP0826181A1 Prosecution History, Annex to the communication dated March 14, 2012
1023.	EP Pub. No. EP0826181A1 Prosecution History, Closing of Application dated June 14, 2012

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