

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**ZYNGA, INC.**

Petitioner

**V.**

**PERSONALIZED MEDIA COMMUNICATIONS LLC**

Patent Owner

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Case No. IPR2013-00164

U.S. Patent No. 7,797,717

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**PATENT OWNER'S LIST OF PROPOSED MOTIONS**

## PETITIONER'S LIST OF PROPOSED MOTIONS

In anticipation of the Initial Conference Call with the Patent Trial and Appeal Board scheduled for August 27, 2013, Patent Owner Personalized Media Communications, LLC (“PMC”) provides the following list of currently contemplated motions pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (Aug. 14, 2012):

1. If the need arises, a motion for discovery regarding secondary considerations for non-obviousness;
2. If the need arises, a motion to amend the claims;
3. Motion to exclude evidence, should such a motion be considered necessary later in the proceeding; and
4. Other motions as the occasion arises (PMC relies on the statement in the Trial Practice Guide: “Submission of a list would not preclude the filing of additional motions not contained in the list.” *Id.* at 48765).

Dated: August 23, 2013

Respectfully submitted,

By Thomas J. Scott, Jr./

Thomas J. Scott, Jr.

Registration No.: 27,836

GOODWIN PROCTER LLP

IPR2013-00164  
Patent No. 7,797,717 B1  
Atty. Docket: PMC-006

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Attorney for Patent Owner

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the:

**PATENT OWNER'S LIST OF PROPOSED MOTIONS**

filed herewith was served on:

**David B. Cochran at [dcochran@jonesday.com](mailto:dcochran@jonesday.com)**  
and  
**Joseph M. Sauer at [jmsauer@jonesday.com](mailto:jmsauer@jonesday.com)**

pursuant to 37 C.F.R. § 42.8(e)(1) and the consent found in Section VI.C of the Petition (Paper No. 1) and repeated in the Section VI.C of the Supplemental Petition (Paper No. 4).

Dated: August 23, 2013

By: /Thomas J. Scott, Jr./