

Filed on behalf of Game Show Network, LLC and WorldWinner.com, Inc.

By: Brenton R. Babcock

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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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**Game Show Network, LLC and WorldWinner.com, Inc.,**

Petitioners,

v.

Patent Owner of

**U.S. Patent 6,174,237 to Stephenson**

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**Case IPR2013-00289**

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**PETITIONERS' PROPOSED MOTIONS**

Pursuant to the Decision Instituting Trial (Paper 8) and the Office Trial Practice Guide, 77 Fed. Reg. 48756 at 48765-66, Petitioners Game Show Network, LLC and WorldWinner.com, Inc. (collectively "GSN") hereby raise the following issue regarding proposed motions that are currently contemplated for filing by GSN during this proceeding.

GSN may seek authorization at a later date to file motions requesting discovery related to factual issues that may be raised by Patent Owner in its Response to the Petition for *Inter Partes* Review, including, but not limited to, factual issues concerning objective indicia (or secondary considerations) of non-obviousness (with respect to claims for which obviousness is an issue in this proceeding).

GSN raises the above issue without prejudice to GSN's right to seek authorization to bring additional motions as circumstances may warrant during this proceeding.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 6, 2013 By: Brenton R. Babcock/  
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IPR2013-00289  
GSN v. Stephenson

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of **PETITIONERS'**  
**PROPOSED MOTIONS** is being served on December 6, 2013, via email  
pursuant to 37 C.F.R. § 42.6(e) per agreement of the parties, to counsel for  
Stephenson at the email address set forth below:

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VIA EMAIL

Dated: December 6, 2013

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