Filed: February 11, 2014

UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD CARDIOCOM, LLC Petitioner v. ROBERT BOSCH HEALTHCARE SYSTEMS, INC. Patent Owner CASE NO. IPR2013-00468 Patent No. 7,516,1921

Patent Owner's Notice Regarding Proposed Motions

¹ Case No. IPR2013-00469 has been joined with this proceeding.



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The initial conference call for this trial is scheduled for February 13, 2014. Further to the Board's Decision (Paper No. 22, January 28, 2014) instituting inter partes review of U.S. Patent 7,516,192, Patent Owner Robert Bosch Healthcare Systems, Inc., gives notice that it is considering filing the following motions:

- 1. Motion for Routine Discovery
- 2. Motion for Additional Discovery
- 3. Motion to File Supplemental Evidence
- 4. Motion to Exclude Evidence
- 5. Motion to Permit Videorecording of Depositions and Use of Videorecorded Testimony

Patent Owner would also like to confirm that joinder of IPR2013-00469 with this IPR does not substantively impact Patent Owner's rights by, for example, changing the page limits to which Patent Owner would otherwise be entitled for these two joined proceedings.

The above list is not intended to exclude other motions the Patent Owner may consider filing at a later date, for example a Motion to Amend Claims. Patent Owner will seek guidance and authorization from the Board, if required, should the need arise for filing further motions.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: February 11, 2014 By: /s/ Don Daybell

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February 2014, a copy of **Patent Owner's Notice Regarding Proposed Motions** was served by electronic mail upon the following counsel for Cardiocom, LLC:

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Dated: February 11, 2014 By: <u>/s/ Sally Hartwell</u>

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