

Filed on behalf of Cardiocom, LLC

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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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CARDIOCOM, LLC  
Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.  
Patent Owner

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Case IPR2013-00468<sup>1</sup>  
Patent 7,516,192

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**PETITIONER'S LIST OF ANTICIPATED  
AND POTENTIAL MOTIONS**

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<sup>1</sup> Case IPR2013-00469 has been joined with this proceeding.

In preparation for the February 13, 2014 initial conference call as scheduled in this proceeding, and pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (Aug. 14, 2012), Petitioner Cardiocom LLC (“Cardiocom”) provides the following list of motions it currently is considering filing.

This list is provided without prejudice to Petitioner’s right to seek authorization to file additional motions or to decide not to file motions listed.

1. Motion for Additional Discovery pursuant to 37 C.F.R. § 42.51(b)(2);
2. Motion to File Supplemental Information pursuant to 37 C.F.R. § 42.123;
3. Motion to Exclude Evidence pursuant to 37 C.F.R. § 42.64; and
4. A Motion to Permit the Video-Recording of Depositions and For Use of Video-Recorded Testimony Pursuant to 37 C.F.R. § 42.53(a).

Respectfully submitted,

MERCHANT & GOULD P.C.

/Daniel W. McDonald/  
Daniel W. McDonald, Reg. No. 32,044  
Attorneys for Petitioner Cardiocom, LLC

Date: February 11, 2014

## Certification of Service

Pursuant to 37 C.F.R § 42.6, the undersigned hereby certifies that a copy of this PETITIONER'S LIST OF ANTICIPATED AND POTENTIAL MOTIONS has been served on February 11, 2014, by email on counsel of record for the patent owner at the following name and address:

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