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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 IPR2013-00468
Patent 7,516,192

**UNOPPOSED MOTION TO EXPUNGE AND FILE
CORRECTED PETITIONER'S REPLY TO PATENT OWNER'S
RESPONSE WITH RESPECT TO U.S. PATENT NO. 7,516,192**

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.22(a)(1) and for the reasons set forth below, Cardiocom, LLC (“Petitioner”) respectfully: (1) requests the Board expunge Petitioner’s Reply To Patent Owner’s Response With Respect To U.S. Patent No. 7,516,192 (“Petitioner’s Reply”), Paper 46, filed on June 10, 2014, from the record; and (2) files in its place a Corrected Petitioner’s Reply.

II. STATEMENT OF MATERIAL FACTS

1. Petitioner filed its Petitioner’s Reply and related Exhibits on June 10, 2014.
2. A clerical error in Petitioner’s Reply was identified after it was filed.
3. Petitioner contacted Counsel for Patent Owner informing them of the error. Counsel for Patent Owner stated that they would not oppose the present Motion.
4. On July 7, 2014, the Petitioner emailed the Board, requesting authorization to file this Unopposed Motion to Expunge and File a Corrected Petitioner’s Reply To Patent Owner’s Response With Respect To U.S. Patent No. 7,516,192.
5. On July 7, 2014, the Board authorized such a filing in an email to Dan McDonald, the lead counsel for Petitioner.
6. Petitioner submits herewith, as an attachment to the present Motion,

the Corrected Petitioner's Reply To Patent Owner's Response With Respect To U.S. Patent No. 7,516,192 ("Corrected Petitioner's Reply") for filing into the record should the Board grant the present Motion.

7. Petitioner certifies that the Corrected Petitioner's Reply only replaces an incorrect citation to "*Id.*" with the correct citation to "David Dep."

III. STATEMENT OF THE REASONS FOR RELIEF REQUESTED

Petitioner files the present Motion in accordance with the Board's email authorization dated July 7, 2014. The Corrected Petitioner's Reply serves to clarify and complete the record before the Board and does not introduce new material into the proceeding. For the foregoing reason, Petitioner respectfully: (1) requests that the Board expunge the Petitioner's Reply, Paper 46 from the record; and (2) files in its place the Corrected Petitioner's Reply.

Respectfully submitted,

MERCHANT & GOULD P.C.

Date: July 15, 2014

/Daniel W. McDonald/

Daniel W. McDonald, Reg. No. 32,044

Attorneys for Petitioner Cardiocom, LLC

Certification of Service

Pursuant to 37 C.F.R § 42.6(e), the undersigned hereby certifies that a copy of this **UNOPPOSED MOTION TO EXPUNGE AND FILE CORRECTED PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE WITH RESPECT TO U.S. PATENT NO. 7,516,192** has been served on July 15, 2014, by email on counsel of record for the patent owner at the following name and address:

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Respectfully submitted,

Date: July 15, 2014

/Daniel W. McDonald/
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