

Case IPR2013-00479  
Patent No. 5,832,494

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FACEBOOK, INC., LINKEDIN CORP., and TWITTER, INC.,  
Petitioners

v.

SOFTWARE RIGHTS ARCHIVE, LLC  
Patent Owner

Patent No. 5,832,494  
Issue Date: November 3, 1998  
Title: METHOD AND APPARATUS FOR INDEXING,  
SEARCHING AND DISPLAYING DATA

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*Inter Partes* Review No. IPR2013-00479

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PETITIONERS' LIST OF PROPOSED MOTIONS

Petitioners Facebook, Inc., LinkedIn Corp., and Twitter, Inc. ("Petitioners") respectfully identify the following motions that Petitioners currently anticipate they might file, pursuant to Office Trial Practice Guide 77 Fed. Reg. 48756 at 48765-66.

- Motion To Submit Supplemental Information (37 C.F.R. § 42.123)

Petitioners understand that they need not file any motion to serve and file supplemental evidence pursuant to 37 C.F.R. § 42.64(b)(2) in response to the Patent Owner's evidentiary objections. To the extent any authorization by the Board were deemed necessary or appropriate for Petitioners to file the supplemental evidence, Petitioners reserve the right to seek such authorization.

- Motion For the Imposition of Sanctions (37 C.F.R. § 42.12)

Petitioners do not lightly raise the issue of sanctions, and hope that no motion relating to sanctions will be necessary. However, the Patent Owner filed numerous evidentiary objections that do not have any objectively reasonable basis. The parties subsequently conferred and the Patent Owner has withdrawn many of the objections. However, the Patent Owner still maintains numerous objections that will require Petitioners to incur substantial time and expense to respond. To the extent the Patent Owner declines to withdraw evidentiary objections that do not have any objectively reasonable basis, thereby requiring Petitioners to incur unnecessary costs to respond, Petitioners reserve the right to request that the Board impose appropriate sanctions under 37 C.F.R. § 42.12.

Petitioners further reserve the right to request any motions that may become

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appropriate in view of any further events or submissions in these proceedings.

Respectfully submitted,

DATED: February 24, 2014

/Heidi L. Keefe/

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**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to 37 CFR sections 42.6(e), that a complete copy of the attached **PETITIONERS' LIST OF PROPOSED MOTIONS** is being served via electronic service at the email address noted below on the 24th day of February, 2014, the same day as the filing of the above-identified document in the United States Patent and Trademark Office/Patent Trial and Appeal Board, upon the patent owner's attorneys of record:

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