

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CONOPCO, INC. d/b/a UNILEVER
Petitioner

v.

THE PROCTER & GAMBLE COMPANY
Patent Owner

Case IPR2013-00509
Patent 6,451,300

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

In view of the initial conference to be held on March 7, 2014, The Procter & Gamble Company (“Patent Owner”) hereby files and serves the following list of proposed motions:

I. CONTINGENT MOTION UNDER 37 C.F.R. § 42.221 TO AMEND

Patent Owner may move to amend one or more of the involved claims of the '300 patent. Any such claim amendments will be made to respond to one or more of the grounds of unpatentability involved in the trial and will not enlarge the scope of the claims of the '300 patent (37 C.F.R. § 42.221(a)(2)(i)) or introduce new matter (37 C.F.R. § 42.221(a)(2)(ii)).

II. CONTINGENT MOTION UNDER 37 C.F.R. § 42.54 FOR A PROTECTIVE ORDER

Patent Owner may move for a protective order under 37 C.F.R. § 42.54(a)(7) to protect from public view Patent Owner’s trade secret, or other confidential research, development, or commercial information that it may submit as objective evidence of non-obviousness, including evidence of unexpected results over the prior art and of the commercial success of products that practice the '300 patent.

March 5, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on March 5, 2014, a copy of the foregoing **PATENT OWNER'S LIST OF PROPOSED MOTIONS** was served by electronic mail (per the parties' agreement), on the following counsel of record for Petitioner:

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