Filed on behalf of TPK Touch Solutions Inc.

Petitioner,

V.

TPK TOUCH SOLUTIONS INC.
Patent Owner

Case IPR 2013-00568 U.S. Patent No. 8,217,902

PATENT OWNER REPLY SUPPORTING MOTION TO EXCLUDE PURSUANT TO 37 C.F.R. § 42.64(c)



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TABLE OF AUTHORITIES

CASES

LKQ Corp. v. Clearlamp, LLC,	~
IPR2013-00020, Paper 17 (Mar. 5, 2013)	
Net MoneyIN, Inv. v. VeriSign, Inc.,	
545 F.3d 1359, 1369 (Fed. Cir. 2008)	2
STATUTES AND RULES	
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Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48758 (Aug. 14, 2012)	1



LIST OF EXHIBITS

TPK Exhibit No.	Document Description
TPK 2001	G. Barrett & R. Omote, "Projected-Capacitive Touch Technology"
TPK 2002	Declaration of Joshua R. Smith
TPK 2003	Curriculum Vitae of Joshua R. Smith
TPK 2004	Walker, "Fundamentals of Touch Technologies and Applications"
TPK 2005	Hotelling et al., U.S. Patent No. 7,920,129
TPK 2006	Geaghan, U.S. Patent No. 8,279,187
TPK 2007	Crosby, "Self Capacitive Sensing Brings Touch to Large- Screen Products", Zytronic
TPK 2008	Walker, "Part 1: Fundamentals of Projected-Capacitive Touch Technology"
TPK 2009	Deposition Transcript of Dr. Vivek Subramanian, June 11, 2014
TPK 2010	Decision – Institution of Inter Partes Review, Case IPR2013-00568 (not submitted)
TPK 2011	Decision – In the Matter of Certain Mobile Devices, and Related Software Thereof, ITC Inv. No. 337-TA-750
TPK 2012	Figure 2 from Japanese Published Patent Appl. No. 61-84729 to Honeywell (excerpt of Wintek Ex. 1007)
TPK 2013	Information Display Journal, Vol. 26, No. 3, March 2010
TPK 2014	Decision – Institution of Inter Partes Review, Case IPR2013-00567 (not submitted)
TPK 2015	Testimony of Dr. Subramanian in ITC Inv. No. 337-TA-750
TPK 2016	Binstead, U.S. Patent Publication No. 2012/0188201
TPK 2017	Declaration of Ted Tsai in Support of Patent Owner's Response
TPK 2018	Daiwa Capital Markets, March 2012 market report
TPK 2019	Amazon Kindle Electrode Structure (Filed Under Seal)



TPK Exhibit No.	Document Description
TPK 2020	NPD DisplaySearch, Q1'14 Quarterly Touch Panel Market Analysis, April 2014
TPK 2021	Economic Daily News Article, February 2009
TPK 2022	J.P. Morgan, TPK Holding Co., Ltd. research report, October 2012
TPK 2023	NPD Display Search, Touch Panel Market Analysis Q4'12 Update, December 2012
TPK 2024	Stipulated Protective Order – Clean
TPK 2025	Stipulated Protective Order – Redlined
TPK 2026	Affidavit of Derek Tang
TPK 2027	Supplemental Affidavit of Derek Tang
TPK 2028	Patent Owner's Objections to Evidence, October 3, 2014



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