

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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YAMAHA CORPORATION OF AMERICA  
Petitioner

v.

BLACK HILLS MEDIA, LLC  
Patent Owner

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Case IPR2013-00598  
Patent 8,214,873 B2

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**PATENT OWNER'S LIST OF ANTICIPATED 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

An initial conference call is scheduled for Tuesday, April 22, 2014 at 2:00pm EST. Pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (Aug. 14, 2012), Patent Owner Black Hills Media, LLC (“Black Hills”) submits the following list of proposed motions it currently is considering filing.

Although a first motion to amend claims, motions for observations on cross-examination, and motions to exclude evidence are automatically authorized by the Board, Patent Owner identifies such motions to preserve its right to file them. This list is provided without prejudice to Patent Owner’s right to seek authorization to file additional motions or to decide not to file motions listed.

#### **List of Proposed Motions**

1. Pursuant to 37 C.F.R. § 42.121(a), a possible motion to amend claims;
2. A motion for observations on cross-examination testimony of a Petitioner’s reply witness; and
3. Pursuant to 37 C.F.R. § 42.64(c), a motion to exclude evidence.

Respectfully submitted,

/Lana Gladstein/  
Lana Gladstein (Registration No. 48,502)  
Lead Attorney for Patent Owner Black Hills  
Media, LLC

Date: April 18, 2014  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above-captioned “**PATENT OWNER’S LIST OF ANTICIPATED PROPOSED MOTIONS**” was served in its entirety on April 18, 2014, via email upon the following counsel of record for the Petitioner:

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Respectfully submitted,

/Lana Gladstein/

Lana Gladstein (Registration No. 48,502)  
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