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24 *PIONEER ELECTRONICS (USA) INC.*

25 UNITED STATES DISTRICT COURT
26 CENTRAL DISTRICT OF CALIFORNIA
27 WESTERN DIVISION

28 BLACK HILLS MEDIA, LLC,

Plaintiff,

v.

PIONEER CORPORATION;
PIONEER ELECTRONICS
(USA) INC.,

Defendants.

Case No. CV 13-05980 SJO (PJWx)

**Notice of Election of Pioneer
Corporation and Pioneer
Electronics (USA) Inc. Regarding
Certain Inter Partes Reviews**

Hon. S. James Otero
Hon. Patrick J. Walsh

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In accordance with the proceedings before this Court on November 12, 2013, Defendants Pioneer Corporation and Pioneer Electronics (USA) Inc. (collectively, "Pioneer") hereby state that if the Court grants a stay of this Case No. CV 13-05980 SJO (PJWx) until the final written decisions by the Patent Trial and Appeal Board under section 35 USC § 318 or terminations with regard to all of *inter partes* review case numbers IPR2013-00593, IPR2013-00594, IPR2013-00597 and IPR2013-00598, then Pioneer agrees to be bound by each such final written decision.

Respectfully submitted,

Dated: November 14, 2013

QUINN EMANUEL URQUHART
& SULLIVAN LLP

/s/ Harold A. Barza

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CERTIFICATE OF SERVICE

This is to certify that, pursuant to L.R. 5.3-3, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this electronically filed document (“**NOTICE OF ELECTION OF PIONEER CORPORATION AND PIONEER ELECTRONICS (USA) INC. REGARDING CERTAIN INTER PARTES REVIEWS**”) via the Court’s CM/ECF system and will accordingly receive a “Notice of Electronic Filing.”

I declare under penalty of perjury that the above is true and correct.

Executed at Los Angeles, California, on November 14, 2013.

/s/ Robert S. Hill

Robert S. Hill