

Broadcom Corporation,
Petitioner

v.

Wi-Fi One, LLC,
Patent Owner

IPR2013-00601

Trial Hearing: December 8, 2014

Patent Owner's Demonstrative Exhibits

Wi-Fi One Exhibit 2024
Broadcom v. Wi-Fi One
IPR2013 – 00601

The Petitions Are Barred Under 315(b)

“(b) Patent Owner's Action.—An inter partes review may not be instituted if the petition requesting the proceeding is filed more than 1 year after the date on which the petitioner, *real party in interest*, or *privy of the petitioner* is served with a complaint alleging infringement of the patent.”

Paper No. 40 at 5-6

Wi-Fi One, LLC
Exhibit 2024-2

The Petitions Are Barred Under 315(b)

Case 6:10-cv-00473-LED-KFG Document 670 Filed 12/20/13 Page 1 of 4 PageID #: 26632

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DISTRICT

ERICSSON INC., et al.,
Plaintiffs,

vs.

D-LINK CORPORATION, et al.,
Defendants.

ORDER
Before the Court are Plaintiff Ericsson's
Protective Order (Docket No. 662) and Ericsson's
(Docket No. 664). For the following motions, the

BACKGROUND
On August 8, 2013, the Court entered its
Corporation and Toshiba America Information Systems, Inc. ("Dell") in favor of Plaintiffs Ericsson (collectively, "Ericsson"). During the course of the litigation, Ericsson discovered (1) an indemnity agreement between Toshiba and non-party Broadcom Corporation ("Broadcom"), (2) an indemnity agreement between Dell and Broadcom, and (3) an email between Dell and Broadcom discussing indemnification (collectively "Indemnity Documents"). Dell and Toshiba disclosed the Indemnity Documents pursuant to the Court's Protective Order, originally issued on October 18, 2011. Docket No. 148.

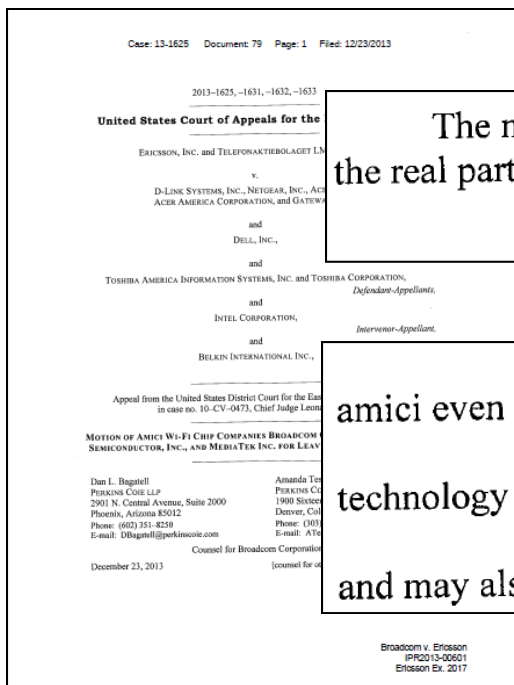
disclosed the Indemnity Documents pursuant to the Court's Protective Order, originally issued on October 18, 2011. Docket No. 148.

(collectively, "Ericsson"). During the course of the litigation, Ericsson discovered (1) an indemnity agreement between Toshiba and non-party Broadcom Corporation ("Broadcom"), (2) an indemnity agreement between Dell and Broadcom, and (3) an email between Dell and Broadcom discussing indemnification (collectively "Indemnity Documents"). Dell and Toshiba disclosed the Indemnity Documents pursuant to the Court's Protective Order, originally issued on October 18, 2011. Docket No. 148.

Ex. 2016 at 1

Wi-Fi One, LLC
Exhibit 2024-3

The Petitions Are Barred Under 315(b)



The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is:

Broadcom Corporation

amici even though they were not parties to the case. Because the accused technology is inside amici's chips, the award would affect demand for those chips and may also provoke indemnification issues. More generally, for reasons

Ex. 2017 at 2-4

Wi-Fi One, LLC
Exhibit 2024-4

'215 Patent: Instituted Grounds

Board instituted an *inter partes* review of claims 1, 2, 4, 6, 8, 15, 22, 25, 26, 29, 32, 34, 45, 46, 49, 52, and 54 of the '215 patent based solely on Seo

Paper No. 29 at 22

Wi-Fi One, LLC
Exhibit 2024-5

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