

Filed on behalf of: Telefonaktiebolaget L. M. Ericsson

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADCOM CORPORATION

Petitioner

v.

TELEFONAKTIEBOLAGET L.M. ERICSSON

Patent Owner

Case IPR2013-00636
U.S. Patent Nos. 6,424,625

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the Patent Trial and Appeal Board instituting trial on March 10, 2014, and in advance of the Initial Conference Call scheduled for April 1, 2014, Patent Owner Telefonaktiebolaget L.M. Ericsson (“Ericsson”) submits this list of proposed motions it presently intends to file in the above-captioned *Inter Partes* Review proceeding.

LIST OF PROPOSED MOTIONS

1. A motion to exclude evidence pursuant to 37 C.F.R. § 42.64(c).
2. Ericsson has not yet determined whether it will file a motion to amend, but reserves its right to do so pursuant to 37 C.F.R. § 42.121(a). Ericsson requests authorization at this time to file a motion to amend claims in advance of the Initial Conference Call to conserve the Board’s time and resources.

Ericsson does not anticipate additional motions at this time, but reserves its right to file any motion provided by 37 C.F.R. 42 as a matter of right.

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Dated: March 28, 2013.

Respectfully submitted,

/Peter J. Ayers/

PETER AYERS

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CERTIFICATE OF SERVICE

The undersigned certifies that on March 28, 2014 the foregoing PATENT OWNER'S LIST OF PROPOSED MOTIONS was served via email on Lead and Back-up Counsel for Broadcom Corporation identified in Broadcom's Mandatory Notices, whom consented to electronic service:

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