

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FACEBOOK, INC.,
Petitioner

v.

B.E. TECHNOLOGY, LLC
Patent Owner

Case No. IPR2014-0052
Patent No. 6,628,314

FACEBOOK'S LIST OF PROPOSED MOTIONS

Pursuant to the Patent Trial and Appeal Board instituting trial on April 9, 2014, and in advance of the initial conference call scheduled for May 6, 2014, Petitioner Facebook, Inc. hereby provides a list of the proposed motions it may file in the above-captioned *inter partes* review proceeding. Although motions to exclude evidence and motions for observations on cross-examination have been authorized by the Board, Facebook identifies such motions here to preserve its right to file them. Petitioner lists those motions it presently expects it may file. Petitioner reserves the right to seek permission to file additional motions not listed below pursuant to the Board's authorization.

PETITIONER'S PROPOSED MOTIONS

1. Motion for discovery concerning conception and reduction to practice should patent owner attempt to antedate any of petitioner's prior art references;
2. Motion to consolidate related proceedings;
3. Motion pursuant to 37 C.F.R. § 42.223 to file supplemental information;
4. Motion pursuant to 37 C.F.R. § 42.64(c) to exclude evidence;
5. Motion pursuant to 37 C.F.R. § 42.51 for observations on cross examination; and

6. Motion to enlarge trial to include grounds denied as redundant.

Respectfully submitted,

DATED: May 5, 2014

/Heidi Keefe/

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Registration No. 40,673

Counsel for Petitioners

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Facebook's List of Proposed Motions together with all exhibits and other papers filed therewith were served on May 5, 2014 by electronic mail on the Patent Owner via its attorneys of record:

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Dated: May 5, 2014

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