

**BEFORE THE PATENT TRIAL AND APPEAL BOARD IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**Trial No.:** IPR 2014-00059  
**In re:** U.S. Patent No. 6,415,280  
**Patent Owners:** PersonalWeb Technologies, LLC & Level 3 Communications  
**Petitioner:** Rackspace US, Inc. and Rackspace Hosting, Inc.  
**Inventors:** David A. Farber and Ronald D. Lachman

For: IDENTIFYING AND REQUESTING DATA IN NETWORK USING IDENTIFIERS WHICH ARE BASED ON CONTENTS OF DATA

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April 25, 2014

**PATENT OWNER'S INITIAL LIST OF PROPOSED MOTIONS FOR DISCUSSION DURING INITIAL CONFERENCE CALL**

An initial conference call is scheduled in this matter for Tuesday, April 29, 2014, at 3:00 pm. Patent Owner submits this initial listing of proposed motions which it may bring during this trial. This listing is without prejudice to Patent Owner's right to seek authorization to bring additional motions, or to decide not to bring motions as indicated, as circumstances may warrant.

1. Motion to Exclude Under Rule 42.64.
2. Motion for Observations on Cross-Examination – if applicable.
3. Motion for admission *pro hac vice* for one additional attorney.

Patent owner would also like to discuss how to coordinate discovery between the five IPRs: 2014-00057, -00058, -00059, -00062, and -00066.

Patent owner also desires to file opposition(s), if appropriate, to motions filed by petitioner as permitted under the Rules.

Respectfully submitted,

**NIXON & VANDERHYTE P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify service of the foregoing Patent Owner's Initial List of Proposed Motions for Discussion During Initial Conference Call to the following lead counsel for petitioner on April 25, 2014 via email (pursuant to agreement between the parties):

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