

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Reloaded Games, Inc.
Petitioner
v.

Parallel Networks LLC
Patent Owner

Inter Partes Review Control No. IPR2014-00136

In re U.S. Patent No. 7,188,145 (Lowery et al.)

PATENT OWNER'S LIST OF ANTICIPATED PROPOSED MOTIONS

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to the Trial Practice Guide, 77 Fed. Reg. 48,756, 48,765-66 (Aug. 14, 2012), in advance of the initial conference call with the Board scheduled for June 3, 2014 at 11:00 a.m. EST, Patent Owner Parallel Networks LLC (“Parallel”) submits the following list of motions that Parallel is considering filing in this matter. This list includes motions that are anticipated as of the date of this filing. Parallel may seek Board authorization to file additional motions in the future.

A. Contingent Motion to Amend Under 37 C.F.R. § 42.121

Parallel may file a contingent motion to amend one or more of the challenged claims of the ‘145 patent. Any such motion would respond to the grounds of unpatentability alleged in this trial and would not seek to enlarge the scope of the claims of the patent or introduce new subject matter.

B. Motion to Exclude Evidence Under 37 C.F.R. § 42.64(c)

Parallel may file a motion to exclude any exhibit to which it serves objections pursuant to 37 C.F.R. § 42.64(b)(1). The bases for any such motion would be set forth in objections served pursuant to 37 C.F.R. § 42.64(b)(1) and expanded upon in the motion to exclude.

C. Motion for Observations on Cross-Examination

Parallel may seek to file observations on cross-examination. In the event that a deposition occurs after the last substantive papers have been filed, and

testimony needs to be called to the Board's attention, Parallel reserves the right to file observations on cross-examination.

Date: May 30, 2014

Respectfully submitted,

/Darren W. Collins/
Darren W. Collins
Registration No. 44,625
Aaron J. Pickell
Registration No. 60,614
MCGUIREWOODS LLP
1717 McKinney Ave., Suite 700
Dallas, TX 75202
(214) 593-7143
Attorney for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned *Parallel Networks LLC's List of Anticipated Proposed Motions* was served on this 30th day of May, 2014, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

Eric A. Buresh
Mark C. Lang
ERISE IP, P.A.
6201 College Blvd., Suite 300
Overland Park, KS 66211
eric.buresh@eriseip.com
mark.lang@eriseip.com

Respectfully submitted,

/Darren W. Collins/
Darren W. Collins
Registration No. 44,625
Aaron J. Pickell
Registration No. 60,614
MCGUIREWOODS LLP
1717 McKinney Ave., Suite 700
Dallas, TX 75202
(214) 593-7143
Attorney for Patent Owner