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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WAVEMARKET, INC. D/B/A LOCATION LABS  
Petitioner

v.

LOCATIONNET SYSTEMS, LTD.  
Patent Owner

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Case No. IPR2014-00199  
U.S. Patent 6,771,970

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**PATENT OWNER'S MOTION TO EXCLUDE EVIDENCE  
PURSUANT TO 37 C.F.R. §§ 42.62 AND 42.64(c)**

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**EXHIBIT LIST**

<b>Ex. #</b>	<b>Description</b>
2001	Pro Hac Vice Motion of Mark Hogge entering an appearance on behalf of T-Mobile USA Inc. in <i>Callwave Communications, LLC v. T-Mobile USA Inc. and Google Inc.</i> , Civil Action No. 12-cv-1703-RGA, D.I. 23 (D. Del.)
2002	Pro Hac Vice Motion of Mark Hogge entering an appearance on behalf of Sprint Nextel Corp. in <i>Callwave Communications, LLC v. Sprint Nextel Corp.</i> , Civil Action No. 12-cv-1702-RGA, D.I. 18 (D. Del.)
2003	A page of Location Labs' website indicating partnering with T-Mobile and Sprint to provide subscription-based, mobile device management and location services
2004	Patent Owner's First Proposed Discovery Requests to Petitioner in <i>Wavemarket, Inc. d/b/a Locations Labs v. Locationet Systems, Ltd.</i> , Case No. IPR2014-00199, U.S. Patent 6,771,970
2005	Sprint's Answer to Callwave's Second Amended Complaint in <i>Callwave Communications, LLC v. Sprint Nextel Corp. and Google, Inc.</i> , Civil Action No. 1:12-cv-01702-RGA, D.I. 71 (D. Del.)
2006	T-Mobile USA Inc.'s Answer to Callwave's Complaint in <i>Callwave Communications, LLC v. T-Mobile USA Inc. and Google, Inc.</i> , Civil Action No. 1:12-cv-01703-RGA, D.I. 68(D. Del.)
2007	Defendants' Opening Brief in Support of Motion To Stay Proceedings on the '970 Patent Pending <i>Inter Partes</i> Review by the Patent Trial and Appeal Board in Civil Action Nos. 12-1701-RGA, 12-1702-RGA, 12-1703-RGA, 12-1704-RGA AND 12-1788-RGA, (D. Del.)
2008	Subpoena to Wavemarket, Inc., d/b/a Location Labs in the matter of <i>Callwave Communications, LLC v. AT&amp;T Inc., AT&amp;T Mobility, LLC and Google, Inc.</i> , Case No. 4:14-mc-80112-JSW, D.I. 17-2 (D. Del.)
2009	April 8, 2014 letter to Leah R. McCoy from Sarah Eskandari, counsel for Petitioner with objections and responses to Petitioner's subpoena
2010	Wavemarket, Inc., d/b/a Location Labs' Objections and Responses to Plaintiff's Subpoena in <i>Callwave Communications, LLC v. AT&amp;T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.)
2011	April 9, 2014, Hearing Transcript in in Civil Action Nos. 12-1701-RGA, 12-1702-RGA, 12-1703-RGA, 12-1704-RGA AND 12-1788-

Ex. #	Description
	RGA, (D. Del.)
2012	April 17, 2013 email from Edward M. Abbati, Vice President of Finance for Petitioner, to Richard Sanders, Chief Executive Officer (“CEO”) of Callwave Communications, LLC
2013	Proposed Protective Order submitted in Civil Action Nos. 12-1701-RGA, 12-1702-RGA, 12-1703-RGA, 12-1704-RGA AND 12-1788-RGA, (D. Del.)
2014	AT&T Answer to Callwave’s Second Amended Complaint in <i>Callwave Communications, LLC v. AT&amp;T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 12-cv-01701-RGA (D. Del.)
2015	Defendants’ Reply Brief In Support of Their Motion to Stay Proceedings on the ’970 Patent Pending <i>Inter Partes</i> Review by the Patent Trial and Appeal Board in Civil Action Nos. 12-1701-RGA, 12-1702-RGA, 12-1703-RGA, 12-1704-RGA AND 12-1788-RGA, (D. Del.)
2016	Declaration of Dr. Narayan Mandayam in Support of LocationNet Systems, Ltd.’s Patent Owner Response in <i>Wavemarket, Inc. d/b/a Locations Labs v. Locationet Systems, Ltd.</i> , Case No. IPR2014-00199, U.S. Patent 6,771,970
2017	Definition of “database,” Dictionary of Computer Words, Houghton Mifflin Company (1998), p. 61
2018	Definition of “database,” Personal Computer Dictionary, Random House (2nd ed. 1996), p. 126
2019	Definition of “engine,” Webster’s New World Dictionary of Computer Terms, Macmillan (5th ed. 1994), p. 208

**NEW EXHIBITS**

Ex. No.	Exhibit Description
2020	Patent Owner’s Evidentiary Objections Pursuant To 37 C.F.R. § 42.64, served on November 17, 2014 in <i>Wavemarket, Inc. d/b/a Locations Labs v. Locationet Systems, Ltd.</i> , Case No. IPR2014-00199, U.S. Patent 6,771,970
2021	Supplemental Declaration of Craig Rosenberg, Ph.D. In Support of Petitioner’s Reply, served on December 1, 2014 in <i>Wavemarket, Inc. d/b/a Locations Labs v. Locationet Systems, Ltd.</i> , Case No. IPR2014-00199, U.S. Patent 6,771,970

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