

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

VIRNETX, INC. AND SCIENCE APPLICATION INTERNATIONAL
CORPORATION,
Patent Owner

Case IPR2014-00237
Patent 8,504,697

Before MICHAEL P. TIERNEY, KARL D. EASTHOM, and STEPHEN C. SIU,
Administrative Patent Judges.

PETITIONER'S LIST OF PROPOSED MOTIONS

I. PETITIONER'S PROPOSED MOTIONS

Other than the motions authorized in the Board's Scheduling Order (Paper 16), Petitioner is not presently requesting leave to file additional motions.

Petitioner reserves the right to pursue additional motions, if appropriate, based on developments in the proceeding.

II. PROPOSED SCHEDULE

Petitioner is prepared to proceed on the basis of the proposed schedule set forth in the Scheduling Order (Paper 16) issued on May 14, 2014.

Dated: May 27, 2014

Respectfully Submitted,

/Jeffrey P. Kushan/
Jeffrey P. Kushan
Registration No. 43,401
Sidley Austin LLP
1501 K Street NW
Washington, DC 20005
jkushan@sidley.com

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May, 2014, a copy of this
Petitioner's List of Proposed Motions has been served in its entirety by email on
the following counsel of record for patent owner:

Joseph E. Palys
Finnegan, Henderson, Farabow,
Garrett & Dunner, L.L.P.
11955 Freedom Drive
Reston, VA 20190-5675
Phone: (571) 203-2700
Fax: (202) 408-4400
E-mail: joseph.palys@finnegan.com

Naveen Modi
Finnegan, Henderson, Farabow,
Garrett & Dunner, L.L.P.
901 New York Avenue, NW
Washington, DC 20001-4413
Telephone: 202-408-4065
Facsimile: 202-408-4400
E-mail: naveen.modi@finnegan.com

Dated: May 27, 2014

Respectfully submitted,

/Jeffrey P. Kushan/
Jeffrey P. Kushan
Reg. No. 43,401
Attorney for Petitioner