

United States Patent & Trademark Office  
Patent Trial & Appeal Board

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IPR2014-00439

Patent No. 7,365,871

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IRON DOME LLC  
Petitioner

v.

E-WATCH, INC.  
Patent Owner

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**Petitioner's List of Anticipated Motions For  
Discussion in Initial Conference Call**

Steven Yu (Reg. No. 58,776)  
Lead Counsel for Petitioner  
P.O. Box 10034  
Gaithersburg, MD 20898  
Tel: 202.262.0426  
Email: syu@irondome.com

August 22, 2014

**Petitioner's List of Anticipated Motions For  
Discussion in Initial Conference Call**

An initial conference call is scheduled in this matter for August 26, 2014 at 2:30 PM. Pursuant to the Office Patent Trial Practice Guide (OPTPG), 77 Fed. Reg., 48765 (Aug. 14, 2012), Petitioner submits this list of motions it may bring during this trial. Petitioner reserves the right to seek authorization to bring additional motions, or to decide not to bring motions as indicated, as circumstances may warrant.

**Motion to Take Discovery Relating to Conception and Reduction to Practice**

The Patent Owner seeks to remove the Parulski and Reece references as prior art with a swear-behind affidavit filed under 37 C.F.R. § 1.131. The Board has determined that Patent Owner's 2004 Monroe Declaration (swear-behind affidavit) does not properly antedate Parulski and Reece. Petitioner anticipates on filing a motion to take additional discovery regarding Patent Owner's contentions on conception and reduction to practice. More specifically, the additional discovery will seek information about the dates for conception and reduction to practice (and evidence thereof) for each claim and evidence of diligence.

IRON DOME LLC

By: /Steven Yu/  
Steven Yu (Reg. No. 58,776)  
Lead Counsel for Petitioner  
P.O. Box 10034  
Gaithersburg, MD 20898  
Tel: 202.262.0426  
Email: syu@irondome.com

## CERTIFICATE OF SERVICE

The parties have agreed to electronic service in this matter. The undersigned hereby certifies that the foregoing PETITIONER'S REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE was served on August 22, 2014 by filing through the Patent Review Processing System.

Robert C. Curfiss  
bob@curfiss.com  
19826 Sundance Drive  
Humble, Texas 77346

David O. Simmons  
dsimmons1@sbcglobal.net  
P. O. Box 26584  
Austin, Texas 78755

/Steven Yu/  
Steven Yu  
Lead Counsel for Petitioner