

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.; SAMSUNG ELECTRONICS
AMERICA, INC.; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC;
AND SAMSUNG AUSTIN SEMICONDUCTOR, LLC;
Petitioner

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP
Patent Owner

Case IPR2014-00518
Patent 8,023,580

PETITIONER'S INITIAL LIST OF PROPOSED MOTIONS

Pursuant to the Decision of the Board to institute *inter partes* review (Paper 16, September 23, 2014) and the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756 (August 14, 2012), Samsung Electronics Co. Ltd.; Samsung Electronics America, Inc.; Samsung Telecommunications America, LLC; and Samsung Austin Semiconductor, LLC. (Collectively, “Petitioner”) do not currently anticipate filing any motions.

Petitioner has not listed motions already authorized by the Board, such as set forth in the Scheduling Order (Paper 17), and reserves the right to file those motions and to seek authorization to file any other motions as necessary. *See* Office Patent Trial Practice Guide, at 48765 (“Submission of a list would not preclude the filing of additional motions not contained in the list.”).

For the sake of completeness, the Board is advised that Petitioner anticipates that a Motion for Joinder with this Petition under Rule 42.122(b) in a Related Petition for *Inter Partes* Review directed to claims 2, 19, 49, 52, 53, and 59 of U.S. Patent No. 8,023,580 may be filed. Petitioner does not anticipate additional motions at this time.

Respectfully submitted,

Dated: October 10, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Patent Owner Preliminary Response is being served on counsel of record by filing this document through the Patent Review Processing System as well as delivering a copy via Email directed to:

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