

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC., SAMSUNG TELECOMMUNICATIONS AMERICA, LLC,
SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG
ELECTRONICS COL., LTD.
Petitioners

v.

MICROGRAFX, LLC
Patent Owner

CASE IPR2014-00532
Patent
5,959,633

**PATENT OWNER'S MOTION TO AMEND UNDER 37 CFR §
42.121 FOR *INTER PARTES* REVIEW OF UNITED STATES
PATENT NO. 5,959,633**

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EXHIBIT LIST

Petitioners' Exhibits

Exhibit Number	Description	Date submitted to PRPS
Google-1001	5,959,633 Patent McFarland, et al	03/24/14
Google-1002	5,959,633 File History	03/24/14
Google-1003	Lastra Declaration	03/24/14
Google-1004	5,883,639 Patent (Walton, et al)	03/24/14
Google-1005	5,564,048 Patent (Eick, et al)	03/24/14
Google-1006	Inside Visual C 2nd Ed Version 1.5 (Kruglinski)	03/24/14
Google-1007	American Heritage Dictionary	03/24/14
Google-1008	Preliminary Disclosure of Asserted Claims & Infringement Contentions	03/24/14
Google-1009	Almeling Declaration In Support of Google's Motion for Pro Hac Vice Admission	09/19/14
Google-1010	Second Declaration of David S. Almeling in Support of Petitioners' Motion for <i>Pro Hac Vice</i> Admission	09/30/14

Patent Owner's Exhibits

Exhibit Number	Description	Date submitted to PRPS
Micrografx-2001	Lastra Declaration (NOT FILED)	
Micrografx-2002	IPR2014-00532 Decision to Institute IPR 8-12-14 (NOT FILED)	
Micrografx-2003	Annotated Figure 3 from Lastra Declaration	11/21/14
Micrografx-2004	Transcript of the 11/6/2014 Deposition of Dr. Anselmo Lastra	11/21/14
Micrografx-2005	Declaration of Garry Kitchen	11/21/14
Micrografx-2006	IEEE Authoritative Dictionary 7 th Edition	11/21/14
Micrografx-2007	IBM Terminology Online Dictionary	11/21/14

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I. INTRODUCTION

Patent Owner Micrografx, LLC (hereafter “Patent Owner”) hereby respectfully submits this Motion to Amend seeking to substitute new claim 29 for original claim 1 and to substitute new claim 30 for original claim 2. This filing is timely under the Parties’ Stipulation at Paper 14, as it is being filed by November 21, 2014.

As discussed below, new claims 29 and 30 are patentable over the art known to Patent Owner.

II. AUTHORIZATION FOR PAYMENT OF FEES

The Board is authorized to charge any fees incurred by the Patent Owner in this Case IPR2014-00532 to Deposit Account No. 504592.

III. LISTING OF THE CLAIMS

New claim 29 is proposed as a substitute for original claim 1, and new claim 30 is proposed as a substitute for original claim 8. Underlines show additions to the original claim language.

29. A computerized system comprising:

a storage medium;

a processor coupled to the storage medium;

a computer program stored in the storage medium, the computer program

operable to run on the processor, the computer program further operable to:

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