

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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EASTMAN KODAK COMPANY, AGFA CORPORATION,  
ESKO SOFTWARE BVBA, and HEIDELBERG, USA  
Petitioners

v.

CTP INNOVATIONS, LLC  
Patent Owner

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Case IPR2014-00789  
Patent 6,738,155

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**PATENT OWNER'S LISTING OF ANTICIPATED MOTIONS FOR  
DISCUSSION IN INITIAL CONFERENCE CALL**

An initial conference call is scheduled in this matter for December 11, 2014 at 11:00 am ET. Pursuant to 37 C.F.R. 42.21(a) and the *Office Patent Trial Practice Guide*, 77 Fed. Reg. 48756, 48765 (Aug. 14, 2012), Patent Owner submits this initial listing of motions it anticipates bringing during this trial. Patent Owner reserves the right to seek authorization to bring additional motions as future discovery or filings in this matter may warrant.

### **1. Motion to Amend the Claims**

Patent Owner is evaluating the Board's Decision to institute *inter partes* review in this matter. Patent Owner has taken note of the Board's comments with regard to certain terms in the claim preambles not forming part of the claims, and is evaluating whether to amend one or more of the claims to incorporate one or more of these terms, or other terms supported by the written description, in light of the factors set forth in IPR2012-0027 (Paper 66). Patent Owner requests that a conference call to discuss the proposed motion to amend be set for two weeks before the deadline to file a motion to amend.

Dated: December 9, 2014

Respectfully submitted,

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CALDWELL & BERKOWITZ, P.C.

/W. Edward Ramage/

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on December 9, 2014, the foregoing Listing of Anticipated Motions was served in its entirety via U.S. Express Mail, postage prepaid, and electronic mail upon the following:

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