

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION
AND
ORACLE AMERICA, INC.

Petitioners

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH INSTITUTE

Patent Owner

Case No. IPR2014-00949

Patent No. 6,978,346

PATENT OWNER'S INITIAL MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(2), the Patent Owner hereby provides the following initial mandatory notices.

I. REAL PARTY-IN-INTEREST

Electronics and Telecommunications Research Institute is the owner of U.S. Patent No. 6,978,346 (“the ’346 Patent”), and Safe Storage, LLC is the exclusive licensee of the ’346 Patent in all fields.

II. RELATED MATTERS

The ’346 Patent is involved in the following litigations, all of which are pending in the United States District Court for the District of Delaware:

- *Safe Storage LLC v. Dell Inc.*, 1:12-cv-01624-GMS
- *Safe Storage LLC v. Dot Hill Systems Corp.*, 1:12-cv-01625-GMS
- *Safe Storage LLC v. Hewlett-Packard Co. and 3PAR Inc.*, 1:12-cv-01626-GMS
- *Safe Storage LLC v. Hitachi Data Sys. Corp.*, 1:12-cv-01627-GMS
- *Safe Storage LLC v. NetApp, Inc.*, 1:12-cv-01628-GMS
- *Safe Storage LLC v. Silicon Graphics Int’l Corp.*, 1:12-cv-01629-GMS
- *Safe Storage LLC v. Cisco Systems, Inc.*, 1:13-cv-00926-GMS
- *Safe Storage LLC v. VMware Inc.*, 1:13-cv-00928-GMS
- *Safe Storage LLC v. Infortrend Corp.*, 1:13-cv-00929-GMS

- *Safe Storage LLC v. Nexsan Corp.*, 1:13-cv-00931-GMS
- *Safe Storage LLC v. Overland Storage Inc.*, 1:13-cv-00932-GMS
- *Safe Storage LLC v. Oracle America Inc.*, 1:13-cv-01089-GMS
- *Safe Storage LLC v. ATTO Tech., Inc., Huawei Techs. Co., Ltd., Huawei Techs. USA Inc., and Huawei Enterprise USA Inc.*, 1:13-cv-01090-GMS
- *Safe Storage LLC v. Emulex Corp. (of Delaware) and Emulex Corp. (of California)*, 1:13-cv-01150-GMS
- *Safe Storage LLC v. Int'l Business Machines Corp.*, 1:13-cv-01151-GMS

The '346 Patent was also involved in the following concluded litigations, which were also in the United States District Court for the District of Delaware:

- *Safe Storage LLC v. Promise Technology Inc.*, 1:2013-cv-00927-GMS
- *Safe Storage LLC v. IQSS LLC*, 1:2013-cv-00930-GMS
- *Safe Storage LLC v 3PAR Inc.*, 1:2013-cv-01088-GMS
- *Safe Storage LLC v. StoneFly Inc.*, 1:2013-cv-01152-GMS

The '346 Patent has also been the subject of the following other *inter partes* reviews:

- *Dell Inc., Hewlett-Packard Co., & NetApp, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2013-00635 (instituted by Board decision dated March 20, 2014)

- *Dell Inc., Hewlett-Packard Co., & NetApp, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00152 (not instituted by Board decision dated May 16, 2014)
- *vmWare, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00901 (petition filed June 4, 2014)
- *Int'l Bus. Mach. Corp. & Oracle Am., Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00976 (petition filed June 18, 2014)

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