

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION and HTC AMERICA, INC.
Petitioners

v.

E-WATCH, INC. and E-WATCH CORPORATION
Patent Owner

CASE: IPR2014-00987
Patent No. 7,365,871 B2

PETITIONER'S LIST OF PROPOSED MOTIONS

January 6, 2015

The Patent Trial and Appeal Board instituted an IPR trial in case number IPR2014-00987 on December 9, 2014 (Institution Decision, Paper 6). In advance of the initial conference call scheduled for Thursday, January 8, 2015, Petitioners HTC Corporation and HTC America, Inc. (collectively “Petitioners”) hereby provide a list of the proposed motions it may file in the above-captioned *inter partes* review proceeding. Although motions to exclude evidence and motions for observations on cross-examination have been authorized by the Board in the Scheduling Order (Paper 7 at 3-6), Petitioners identify a list of motions here to preserve the right to file them. Petitioners reserve the right to seek permission to file additional motions not listed below pursuant to the Board’s authorization.

PETITIONER’S PROPOSED MOTIONS

1. Motions to submit supplemental information;
2. Motions to submit supplemental evidence;
3. Motions to exclude evidence;
4. Motion for observation on cross examination;
5. Motions for additional discovery;
6. Motion to request oral argument/hearing; and

7. Additional motions as permitted by the Board trial rules and procedures, or
as authorized by the Board.

Dated: January 6, 2015

Respectfully submitted,

/Bing Ai/

Lead Counsel,

Bing Ai, Reg. No. 43,312

Back-Up Counsel

Cheng C. (Jack) Ko, Reg. No. 54,227

Kevin Patariu, Reg. No. 63,210

Babak Tehranchi, Reg. No. 55,937

PERKINS COIE LLP
11988 El Camino Real, Suite 350
San Diego, CA 92130
(858) 720-5700

HTC Corporation and HTC America, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing
PETITIONER'S LIST OF PROPOSED MOTIONS has been served in its entirety
this 6th day of January 2015 by electronic mail as agreed upon by the parties on
the Patent Owner via its attorneys of record:

Robert C. Curfiss
19826 Sundance Drive
Humble, Texas 77346-1402
bob@curfiss.com

David O. Simmons
IVC Patent Agency
P.O. Box 26584
Austin, Texas 77755
Dsimmons1@sbcglobal.net

Dated: January 6, 2015

Respectfully submitted,

/Bing Ai/

Lead Counsel,
Bing Ai, Reg. No. 43,312

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