

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARTSANA USA, INC.,
Petitioner

v.

KOLCRAFT ENTERPRISES, INC.,
Patent Owner

Case IPR2014-01053
Patent 8,388,501

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the Scheduling Order [Paper 15] regarding the initial conference call scheduled for January 20, 2015 at 1:00 PM Eastern Time, and the requirement that the parties prepare for the call as directed in the Office Trial Practice Guide, 77 Fed. Reg. 48756, Patent Owner Kolcraft Enterprises, Inc. (“Kolcraft” or “Patent Owner”) states as follows:

List of Motions:

1. A motion to amend the patent; and
2. A motion to substitute counsel.

Kolcraft may move to amend one or more claims of the ‘501 patent. As Kolcraft is still evaluating the Board’s Decision, as well as the cited references and arguments addressed therein, Kolcraft expressly reserves the right not to file the motion to amend. Kolcraft’s motion to substitute counsel is discussed below.

Other Matters:

1. Although Kolcraft does not believe it is necessary, Kolcraft is willing to provide an opposition to Petitioner’s pending request for rehearing should it be useful to the Board in any respect.

2. Kolcraft seeks the Board’s authorization to move to substitute the below-listed practitioners associated with customer number 64,194 as the new counsel for Kolcraft and concurrently withdraw the practitioners associated with customer number 98,580, specifically, attorneys Robert A. Conley (Reg. No. 55,846) and

Brian E. Haan (Reg. No. 62,567). The previously accepted *pro hac vice* power of attorney to Raymond P. Niro, Jr. will not be revoked. Following the substitution, Kolcraft's counsel will be as follows:

Lead Counsel	Back-up Counsel
Anthony E. Dowell, Reg. No. 39,661 aedowell@niro-mcandrews.com <u>Postal and Hand-Delivery Address:</u> Niro, McAndrews, Dowell & Grossman, LLC 200 West Madison Street Suite 2040 Chicago, Illinois 60606 Telephone: (312) 755-8578 Fax: (312) 674-7481	Raymond P. Niro, Jr., Previously Admitted <i>Pro Hac Vice</i> rnirojr@niro-mcandrews.com <u>Postal and Hand-Delivery Address:</u> Niro, McAndrews, Dowell & Grossman, LLC 200 West Madison Street Suite 2040 Chicago, Illinois 60606 Telephone: (312) 755-8576 Fax: (312) 674-7481

Dated: January 16, 2015

Respectfully submitted,

/ Brian E. Haan /
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Certificate of Service

Pursuant to 37 CFR § 42.6(e), the undersigned hereby certifies that on January 16, 2015 the foregoing PATENT OWNER'S LIST OF PROPOSED MOTIONS was filed electronically via the Patent Review Processing System and served via electronic transmission on the following, as agreed to by Petitioner's Service Information Under 37 C.F.R. § 42.8(b)(4) in the June 27, 2014 Petition:

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