

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

Applicant:	Dresti et al.	Universal Remote Control, Inc.
Case No.:	IPR2014-01109	v.
Filing Date:	November 6, 2002	Universal Electronics, Inc.
Patent No.:	7,831,930	Trial Paralegal: Cathy Underwood
Title:	SYSTEM AND METHOD FOR DISPLAYING A USER INTERFACE FOR A REMOTE CONTROL APPLICATION	Attorney Doc.: 059489.143600

**MOTION FOR ADDITIONAL DISCOVERY
PURSUANT TO 37 C.F.R. § 42.51(b)(2)(i)**

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TABLE OF EXHIBITS

2001. *3D-Matrix, Ltd. v. Menicon Co.*, IPR2014-00398, Paper No. 11 (P.T.A.B. Aug. 1, 2014)
2002. *Synopsis v. Mentor Graphics Corp.*, IPR2012-00042, Paper No. 16 (P.T.A.B. Feb. 22, 2013)
2003. *Eizo Corp. v. Barco N.V.*, IPR2014-00358, Paper 11 (P.T.A.B. July 23, 2014)
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2016. Claim Construction Order from *Universal Elecs., Inc. v. Peel Techs., Inc.*, No. 8:13-cv-01484 (C.D. Cal.)
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2018. Universal Remote Control, Inc.'s ("URC's") Initial Disclosures from *Universal Electronics, Inc. v. Universal Remote Control, Inc.*, No. 8:12-cv-00329-AG-JPR (C.D. Cal.)
2019. URC's Response to UEI's Interrogatory at No. 6 from *Universal Electronics, Inc. v. Universal Remote Control, Inc.*, No. 8:12-cv-00329-AG-JPR (C.D. Cal.)
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2025. Amended Notice of 30(b)(6) Deposition to URC from *Universal Electronics, Inc. v. Universal Remote Control, Inc.*, No. 8:12-cv-00329-AG-JPR (C.D. Cal.)
2026. Joint Stipulation Staying Action Pending Petitions for *Inter Partes* Review of All Asserted Claims, Dkt. No. 87 from *Universal Electronics Inc., v. Universal Remote Control, Inc., Ohsung Electronics Co., Ltd., and Ohsung Electronics U.S.A., Inc.*, Case No. SACV 13-00984 AG (JPRx) (C.D. Cal.)
2027. Joint Statement of the Parties Pursuant to Order Staying Action (ECF No. 88) and Joint Request to Continue Status Conference, Dkt. No. 102 from *Universal Electronics Inc., v. Universal Remote Control, Inc., Ohsung Electronics Co., Ltd., and Ohsung Electronics U.S.A., Inc.*, Case No. SACV 13-00984 AG (JPRx) (C.D. Cal.)
2028. URC NY Secretary of State, Division of Corporations, Entity Information Website Printout

**PATENT OWNER'S MOTION FOR ADDITIONAL DISCOVERY
PURSUANT TO 37 C.F.R. § 42.51(b)(2)(i)**

Universal Electronics Inc. (“UEI”) respectfully moves the Board for an order granting UEI permission to obtain additional discovery from Universal Remote Control, Inc. (“URC”) relating to URC’s failure to identify all real parties-in-interest. URC did not identify Ohsung Electronics Co., Ltd., and/or Ohsung Electronics U.S.A., Inc. (collectively “Ohsung”) as real parties-in-interest. UEI has identified evidence supporting its contention that Ohsung may be a real party-in-interest subject to the mandatory disclosure provision of 35 U.S.C. § 312(a)(2). URC and Ohsung share office space, at least one key remote control executive, and legal counsel in a related federal district court litigation. Moreover, URC’s CEO’s trial testimony suggests that Ohsung has previously paid certain of URC’s legal fees. In the interest of justice, it is necessary that the Board permit UEI to take limited discovery to explore the full extent to which Ohsung may be a real party-in-interest in this proceeding.

UEI has filed this Motion for Additional Discovery under 37 C.F.R. § 42.51(b)(2)(i) in response to the Board’s March 3, 2015, Order Authorizing Motion for Additional Discovery. (Paper 12.) UEI timely filed the instant motion in accordance with the Board’s March 5, 2015, deadline. (*Id.* at 3.) UEI sought a meet and confer with URC’s counsel, in accordance with the Board’s recommendation. (*Id.*) URC’s counsel offered to permit UEI’s counsel to view

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