

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZHONGSHAN BROAD OCEAN MOTOR CO., LTD.  
Petitioner

v.

NIDEC MOTOR CORPORATION  
Patent Owner

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Case IPR2014-01121  
Patent 7,626,349

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**PETITIONER'S LIST OF ANTICIPATED MOTIONS  
IN ADVANCE OF INITIAL CONFERENCE CALL**

In advance of the Initial Conference Call on February 24, 2015 at 3:00 p.m. (ET), Petitioner Zhongshan Broad Ocean Motor Co., Ltd., et al. (“Petitioner”) submits the following list of motions that it either has already filed or that it anticipates filing during this trial. *See* Office Patent Trial Practice Guide, Fed. Reg. Vol. 77, No. 157 at 48765 (Aug. 14, 2012). This listing is without prejudice to Petitioner’s right to seek authorization to bring additional motions as circumstances warrant. *See* Office Patent Trial Practice, Fed. Reg. Vol. 77, No. 157 at 48763 (Aug. 14, 2012).

- Petitioner has filed a Request for Rehearing (Paper No. 22).
- Petitioner has filed a Second Petition on the patent at issue, IPR2015-00762, and a motion to join the subject *inter partes* trial, IPR2014-01121.
- If the Joinder Motion is granted, Petitioner anticipates filing a motion to expedite Patent Owner’s Preliminary Response under 37 C.F.R. §42.5(c)(1).

Respectfully submitted,

Dated: February 20, 2015

*/ Steven F. Meyer /*

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## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e) and 37 C.F.R. §42.105(b), the undersigned hereby certifies that on February 20, 2015, a complete and entire copy of the foregoing **Petitioner's List of Anticipated Motions in Advance of Initial Conference Call** was electronically served in its entirety on the Patent Owner of record (as agreed upon by counsel) at [sbrown@hoveywilliams.com](mailto:sbrown@hoveywilliams.com), [mwalters@hoveywilliams.com](mailto:mwalters@hoveywilliams.com), and [litigation@hoveywilliams.com](mailto:litigation@hoveywilliams.com).

Additionally, the undersigned certifies that on February 20, 2015, a complete and entire copy of the foregoing **Petitioner's List of Anticipated Motions in Advance of Initial Conference Call** was electronically served on the Patent Owner's below-listed counsel of record at [jschwent@thompsoncoburn.com](mailto:jschwent@thompsoncoburn.com), [djinkins@thompsoncoburn.com](mailto:djinkins@thompsoncoburn.com), and [syoo@thompsoncoburn.com](mailto:syoo@thompsoncoburn.com), in the co-pending litigation *Nidec Motor Corporation v. Broad Ocean Motor LLC et al.*, Civil Action No. 4:13-CV-01895-JCH (E.D. Mo.), as agreed upon by the parties.

Dated: February 20, 2015

*/ Steven F. Meyer /*

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