UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ATopTech, Inc. Petitioner

v.

Synopsys, Inc. Patent Owner

Case IPR2014-01145 Patent 6,237,127

Before TRENTON A. WARD, PETER P. CHEN, and FRANCES L. IPPOLITO, *Administrative Patent Judges*

PETITIONER'S INITIAL LIST OF PROPOSED MOTIONS



Pursuant to the Decision of the Board to institute *inter partes* review (Paper 7, January 21, 2015) and the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756 (August 14, 2012), Petitioner ATopTech, Inc. does not currently anticipate filing any motions.

Petitioner advises the Board that on February 18, 2015, Petitioner filed a new related IPR, Case No. IPR2015-00760 (the "760 IPR"), which challenges claims 5 and 6 of U.S. Patent No. 6,237,127, the same patent involved in this proceeding. The Board denied institution of claims 5 and 6¹ in the present proceeding. The '760 IPR was filed with a motion for joinder under Rule 42.122(b). Petitioner proposes discussing a briefing schedule for the motion for joinder in the '760 IPR as well as the due date for Patent Owner's preliminary response in that proceeding at the telephone conference.

Dated: February 23, 2015

Respectfully submitted,

/s/ Jeffrey A. Miller

Jeffrey A. Miller

Registration No. 35,287

KAYE SCHOLER LLP

Two Palo Alto Square, Suite 400

3000 El Camino Real

Palo Alto, CA 94306

Tel.: (650) 319-4500

Fax: (650) 319-4700

Email: Jeffrey.miller@kayescholer.com

Counsel for Petitioner

¹ The Board also did not institute trial on claims 12 and 13 of the `127 patent in this proceeding, but those claims are not challenged in the new `760 IPR.



CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing is being served on counsel of record by filing this document through the Patent Review Processing System as well as delivering a copy via Email directed to:

David B. Cochran Joseph M. Sauer JONES DAY North Point 901 Lakeside Avenue Cleveland, Ohio 44114 dcochran@jonesday.com jmsauer@jonesday.com David W. Wu JONES DAY 1755 Embarcadero Road Palo Alto, CA 94303 dwwu@jonesday.com

Dated: February 23, 2015 Respectfully submitted,

/s/ Jeffrey A. Miller

Jeffrey A. Miller Registration No. 35,287

KAYE SCHOLER LLP

Two Palo Alto Square, Suite 400

3000 El Camino Real

Palo Alto, CA 94306

Tel.: (650) 319-4500 Fax: (650) 319-4700

Email:

Jeffrey.miller@kayescholer.com

Counsel for Petitioner

