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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VONAGE HOLDINGS CORP., VONAGE AMERICA, INC., VONAGE MARKETING LLC, and NETFLIX, INC. Petitioner

v.

STRAIGHT PATH IP GROUP, INC. Patent Owner

Case IPR No.: *To be assigned*

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,108,704 CHALLENGING CLAIMS 1, 11-12, 14, 16, 19, 22-23, 27, and 30-31 UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104

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TABLE OF AUTHORITIES

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Federal Cases

In re ICON Health & Fitness, Inc.,	
496 F.3d 1374 (Fed. Cir. 2007)	

Federal Statutes

35 U.S.C. § 314(a)5

Federal Regulations

37 C.F.R. § 42.1	1
37 C.F.R. § 42.100(b)	32
77 Fed. Reg. 48764 (Aug. 14, 2012)	

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