

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., AND LG  
ELECTRONICS MOBILECOMM U.S.A, INC.

Petitioner,

v.

CYPRESS SEMICONDUCTOR CORP.,

Patent Owner

---

Case No. IPR2014-01342

Patent 8,004,497

---

**PATENT OWNER'S LIST OF PROPOSED MOTIONS**

## PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the *Office Patent Trial Practice Guide* (OPTPG), 77 Fed. Reg., 48765 (Aug. 14, 2012), Patent Owner submits this initial listing of motions that Patent Owner now contemplates and for which Patent Owner intends to request authorization during the March 9, 2015, telephonic conference.

### **1. Motion to Amend or Substitute Claims**

Patent Owner may move to amend or propose substitute claims pursuant to 37 C.F.R. § 42.121. Any such claim amendments or substitutions will respond to one or more of the grounds of unpatentability involved in the trial and will not enlarge the scope of the claims (37 C.F.R. § 42.221(a)(2)(i)) or introduce new matter (37 C.F.R. § 42.221(a)(2)(ii)).

### **2. Motion to Consolidate IPRs for Purposes of Depositions**

Patent Owner notes that three related *inter partes* review proceedings were instituted on February 9, 2015, between the Patent Owner and Petitioner, LG Electronics. *See* IPR2014-01302, IPR2014-01342 and IPR2014-01343. The parties have discussed the possibility of consolidating the cases for purposes of cross-examination such that each declarant would be subject to one deposition, rather than three separate depositions, in order to streamline and simplify proceedings in the separate IPR proceedings. The cross-examination consolidation would have no other effect on the separate IPR proceedings. If the parties reach agreement on this

issue, Patent Owner requests leave to file a motion to consolidate for purposes of cross-examination depositions, if such a motion is deemed necessary by the Board.

Dated: March 5, 2015

Respectfully submitted,

By: /s/Robert R. Laurenzi

Robert R. Laurenzi

Reg. No. 45,557

Kaye Scholer LLP

250 West 55th Street

New York, NY 10019-9710

T: 212-836-7235

F: 212-836-6427

Email: [rlaurenzi@kayescholer.com](mailto:rlaurenzi@kayescholer.com)

Counsel for Patent Owner

Cypress Semiconductor Corporation

## CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on March 5, 2015, a complete and entire copy of this PATENT OWNER'S LIST OF PROPOSED MOTIONS was provided via email to the Petitioner by serving the correspondence email address of record as follows:

Jason Shapiro  
Soumya Panda  
ROTHWELL, FIGG, ERNST & MANBECK  
607 14<sup>th</sup> Street, N.W., Suite 800  
Washington, DC 20005

Email:       jshapiro@rothwellfigg.com  
                  spanda@rothwellfigg.com

By: /s/Robert R. Laurenzi  
Robert R. Laurenzi  
Kaye Scholer LLP  
250 West 55th Street  
New York, NY 10019-9710  
T: 212-836-7235