Filed on behalf of: LG Electronics, Inc.,

LG Electronics U.S.A., Inc., and

LG Electronics Mobilecomm U.S.A., Inc.

Paper \_\_\_\_

Filed: March 5, 2015

By: Jason M. Shapiro, Lead Counsel

Soumya P. Panda, Back-up Counsel

ROTHWELL, FIGG, ERNST & MANBECK, P.C.

607 14th Street, N.W., Suite 800

Washington, DC 20005 Phone: 202-783-6040 Facsimile: 202-783-6031

Emails: jshapiro@rothwellfigg.com

spanda@rothwellfigg.com

#### 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 IPR2014-01343 Patent 8,519,973 B1

.\_\_\_\_\_

#### PETITIONER'S LIST OF PROPOSED MOTIONS



Pursuant to the Decision of the Board to institute *inter partes* review (Paper 7, February 9, 2015) and the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756 (August 14, 2012), LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc. ("Petitioner"), do not currently anticipate filing any motions not already authorized by the Board.

Petitioner has not listed motions already authorized by the Board, such as those set forth in the Scheduling Order (Paper 8), and reserve the right to file such motions and to seek authorization to file any other motions that may become necessary or appropriate in response to any motions filed or action taken by Patent Owner, or in view of any further events or submissions in these proceedings.

# Respectfully Submitted,

Date: March 5, 2015 By: /Jason M. Shapiro/\_

Jason M. Shapiro, Reg. No. 35,354 Soumya P. Panda, Reg. No. 60,447 Rothwell, Figg, Ernst & Manbeck, P.C. 607 14<sup>th</sup> Street, N.W., Suite 800 Washington, DC 20005

Counsel for Petitioners
LG Electronics, Inc.,
LG Electronics U.S.A., Inc., and
LG Electronics Mobilecomm U.S.A., Inc.



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of March, 2015, a true and correct copy of the foregoing **PETITIONER'S LIST OF PROPOSED MOTIONS** was served, via electronic mail upon the following counsel for Patent Owner Cypress Semiconductor Corp.:

Robert R. Laurenzi, Esq. Kaye Scholer LLP 425 Park Avenue New York, NY 10022 Phone: (212) 836-8000

Email: robert.laurenzi@kayescholer.com

Robert S. Magee, Esq. Kaye Scholer LLP Two Palo Alto Square, Suite 400 3000 El Camino Real Palo Alto, CA 94306 Phone: (650) 319-4500

Email: robert.magee@kayescholer.com

/Erik van Leeuwen/

Erik van Leeuwen Litigation Operations Coordinator Rothwell, Figg, Ernst & Manbeck, P.C.

