## UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., & SAMSUNG TELECOMMUNICATIONS AMERICA, LLC Petitioner,

V.

## STRAIGHT PATH IP GROUP, INC. Patent Owner

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Case IPR2014-01367 U.S. Patent No. 6,009,469

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PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the Patent Trial and Appeal Board instituting trial on March 6, 2015 and the Office Trial Practice Guide, 77 Fed. Reg. 48756 at 48765-66, Patent Owner Straight Path IP Group, Inc. ("Straight Path") advises that it may seek permission to file motions during the trial, including but not limited to the following:

- 1. A motion to submit supplemental information pursuant to 37 C.F.R. § 42.123;
- 2. One or more motions requesting discovery related to issues that may be raised by Petitioner during the trial phase of this *Inter Partes* Review proceeding;
- 3. A motion to seal, containing a proposed protective order, in the event that Straight Path determines that it intends to rely upon confidential information during the trial phase of this *Inter Partes* Review proceeding;
- 4. A motion to submit and address a decision by the Federal Circuit in the pending related case *Straight Path IP Group, Inc. v. Sipnet EU S.R.O.*, No. 15-1212 (Fed. Cir.), which is Straight Path's appeal of the Final Written Decision in related case *Sipnet EU S.R.O. v. Straight Path IP Group, Inc.*, IPR2013-00246;
- 5. A motion to extend the deadline for the hearing date.



Some motions (such as motions for observation on cross-examination and motions to exclude evidence) are automatically authorized by the Board. Although not necessary, Straight Path also identifies such motions and preserves its right to file them. In addition, Straight Path may seek authorization, as necessary, to file additional motions not identified in the above list. *See* Office Trial Practice Guide, 77 Fed. Reg. 48756 at 48756 ("Submission of a list would not preclude the filing of additional motions not contained in the list.").

Respectfully submitted,

Dated: March 24, 2015 /William Meunier/

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## **CERTIFICATE OF SERVICE**

I certify that a copy of Patent Owner's List of Proposed Motions is being served by electronic mail on the following counsel for the Petitioners:

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Dated: March 24, 2015

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