

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner,

v.

CYPRESS SEMICONDUCTOR CORP.,

Patent Owner

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Case No. IPR2014-01405

Patent 6,493,770

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**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* IPR2014-01386, IPR2014-01396 and IPR2014-01405. 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.

### **3. Motion for Additional Discovery**

Patent Owner requests leave to file a motion seeking the full production of all exhibits and papers cited in the declaration of Mr. Geert Knapen, as required by 37 C.F.R. § 42.51(b)(1)(i). In particular, Patent Owner requests production of the complete versions of documents cited to and relied upon by Petitioner and declarant in the Petition to Institute *Inter Partes* Review. Specifically, Exhibit 1004 (PCCextend 100 User's Manual), Exhibit 1013 (Universal Serial Bus Specification, Revision 1.0 ), Exhibit 1017 (PCMCIA Primer), Exhibit 1018 (PCMCIA PC Card Standard, Release 2.01), and Exhibit 1019 (PCMCIA Card Services Specification, Release 2.0), which each appear to be incomplete and constituting only part of the entire respective document. Patent Owner notes that it has objected to these exhibits pursuant to 37 C.F.R. § 42.64(b)(1), the parties have conferred regarding the objections, and Petitioner will respond to the objections next week.

### **4. Motion to Exclude Evidence**

Patent Owner believes it already has authority to file a motion to exclude but notifies the Board that it has objected to, and the parties have conferred regarding, certain evidence relied upon by Petitioner and declarant, including the evidence

noted above, pursuant to 37 C.F.R. § 42.64(b)(1). Petitioner will respond to the objections next week at which time the parties will again confer. If the objections cannot be resolved, Patent Owner seeks leave to file a motion to exclude the objectionable evidence pursuant to 37 C.F.R. § 42.64(c).

Dated: March 5, 2015

Respectfully submitted,

By: /s/Robert R. Laurenzi

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## 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:

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