Filed on behalf of: LG Electronics, Inc.,

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

Filed: March 5, 2015

Paper ____

By: Jason M. Shapiro, Lead Counsel

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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 IPR2014-01405 Patent 6,493,770 B1

PETITIONER'S LIST OF PROPOSED MOTIONS



LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc. ("Petitioner") respectfully identify the following motions that Petitioner currently anticipates it might file, pursuant to Office Trial Practice Guide, 77 Fed. Reg. 48756 at 48765-66:

• Motion to Submit Supplemental Information (37 C.F.R. § 42.123)

Petitioner understands that it need not file any motion to serve and file supplemental evidence pursuant to 37 C.F.R. § 42.64(b)(2) in response to the Patent Owner's evidentiary objections. To the extent any authorization by the Board were deemed necessary or appropriate for Petitioner to file the supplemental evidence, Petitioner reserves the right to seek such authorization.

Petitioner has not listed motions already authorized by the Board, such as those set forth in the Scheduling Order (Paper 8), and reserves 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/

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Case IPR2014-01405 Patent 6,493,770 B1

Counsel for Petitioner
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.:

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/Erik van Leeuwen/

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