

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 CORPORATION  
Patent Owner

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Case IPR2014-01405  
Patent 6,493,770

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**PATENT OWNER'S  
MOTION FOR LEAVE TO FILE**

Patent Owner Cypress Semiconductor Corporation (“Cypress”) hereby moves under 37 C.F.R. §§ 42.6(b)(2) for leave to file certain exhibits to the Patent Owner’s Response to LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc.’s, (“Petitioner”) Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 6,493,770 (“the ’770 patent”).

In support of this motion, Patent Owner Cypress states as follows:

1. On June 5, 2015, Patent Owner was in the process of filing the exhibits in support of their Response when the PRPS system suffered an outage.
2. Patent Owner was able to electronically file both the public and confidential versions of its Patent Owner’s Response and Exhibits 2016 through 2018.
3. Patent Owner was not able to complete the process by filing Exhibits 2019 through 2045 and 2047 through 2060.
4. Patent Owner did timely serve Petitioner with all documents and exhibits. This process was completed via email and ftp file transfer.
5. Patent Owner requests that Exhibits 2019 through 2045 and 2047 through 2060 be accepted by the Board and accorded a filing date of June 5, 2015.
6. Patent Owner is emailing this motion because PRPS is down.
7. In addition, in the email attaching this motion, Patent Owner is providing an FTP link where the Board can download documents.

8. The Board is authorized to deduct any fee due for this motion from  
Deposit Account 500988.

Dated: June 5, 2015

Respectfully submitted,

By: /s/ Jeffrey A. Miller  
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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 June 5, 2015, a complete and entire copy of this Patent Owner Cypress Semiconductor Corp.'s Motion to Seal 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  
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By: /s/ Jeffrey A. Miller  
Jeffrey A. Miller  
Reg. No. 35,287  
Kaye Scholer LLP

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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 CORPORATION  
Patent Owner

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Case IPR2014-01396  
Patent 6,249,825

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**PATENT OWNER'S  
MOTION TO FILE UNDER SEAL**

**PROTECTIVE ORDER**

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