UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
HUGHES NETWORK SYSTEMS, LLC and HUGHES COMMUNICATIONS, INC.,
Petitioners,
v.
CALIFORNIA INSTITUTE OF TECHNOLOGY,
Patent Owner.
IPR2015-00059 (Patent 7,916,781)
TICE IN RESPONSE TO ADDITIONAL DISCOVERY RECARDING





On May 11, 2015, the Board authorized the following limited discovery of documents in the possession of EchoStar and Hughes: "1) legal bills demonstrating DISH involvement in the IPR proceedings, and 2) communications from DISH (not from other entities) related to drafts and approvals of IPR petitions." (Decision on Motion, Paper 21, at 5.) In searching for documents responsive to these discovery requests, Petitioners understood "IPR proceedings" and "IPR petitions" to mean IPRs adverse to Patent Owner Caltech, and not to include unrelated IPR petitions.

After conducting a diligent search of documents within the possession of Hughes and EchoStar, Petitioners respond to these discovery requests as follows: Petitioners have found nothing responsive to these requests.

Respectfully Submitted,

Date: June 11, 2015 /Eliot D. Williams/

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Attorneys for Petitioners, Hughes Network Systems, L.L.C. and Hughes Communications, Inc.



## **CERTIFICATE OF SERVICE**

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 12th day of June, 2015, a complete and entire copy of the foregoing **NOTICE IN RESPONSE TO ADDITIONAL DISCOVERY REGARDING REAL PARTY IN INTEREST** was served via email on the Patent Owner at the correspondence address of record in the proceeding:

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Date: June 12, 2015 /Eliot D. Williams/

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