

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL INC., HEWLETT-PACKARD COMPANY, and NETAPP, INC.

Petitioners

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH INSTITUTE

Patent Owner

Case No. IPR2015-00549

Patent No. 6,978,346

PATENT OWNER'S INITIAL MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(2), the Patent Owner hereby provides the following initial mandatory notices.

I. REAL PARTY-IN-INTEREST

Electronics and Telecommunications Research Institute is the owner of U.S. Patent No. 6,978,346 (“the ’346 Patent”), and Safe Storage, LLC is the exclusive licensee of the ’346 Patent in all fields.

II. RELATED MATTERS

The ’346 Patent is involved in the following litigations, all of which are pending in the United States District Court for the District of Delaware:

- *Safe Storage LLC v. Dell Inc.*, 1:12-cv-01624-GMS
- *Safe Storage LLC v. Dot Hill Systems Corp.*, 1:12-cv-01625-GMS
- *Safe Storage LLC v. Hewlett-Packard Co. and 3PAR Inc.*, 1:12-cv-01626-GMS
- *Safe Storage LLC v. Hitachi Data Sys. Corp.*, 1:12-cv-01627-GMS
- *Safe Storage LLC v. NetApp, Inc.*, 1:12-cv-01628-GMS
- *Safe Storage LLC v. Silicon Graphics Int’l Corp.*, 1:12-cv-01629-GMS
- *Safe Storage LLC v. Cisco Systems, Inc.*, 1:13-cv-00926-GMS
- *Safe Storage LLC v. VMware Inc.*, 1:13-cv-00928-GMS
- *Safe Storage LLC v. Infortrend Corp.*, 1:13-cv-00929-GMS

- *Safe Storage LLC v. Nexsan Corp.*, 1:13-cv-00931-GMS
- *Safe Storage LLC v. Overland Storage Inc.*, 1:13-cv-00932-GMS
- *Safe Storage LLC v. Oracle America Inc.*, 1:13-cv-01089-GMS
- *Safe Storage LLC v. ATTO Tech., Inc., Huawei Techs. Co., Ltd., Huawei Techs. USA Inc., and Huawei Enterprise USA Inc.*, 1:13-cv-01090-GMS
- *Safe Storage LLC v. Emulex Corp. (of Delaware) and Emulex Corp. (of California)*, 1:13-cv-01150-GMS
- *Safe Storage LLC v. Int'l Business Machines Corp.*, 1:13-cv-01151-GMS

The '346 Patent was also involved in the following concluded litigations, which were also in the United States District Court for the District of Delaware:

- *Safe Storage LLC v. Promise Technology Inc.*, 1:2013-cv-00927-GMS
- *Safe Storage LLC v. IQSS LLC*, 1:2013-cv-00930-GMS
- *Safe Storage LLC v 3PAR Inc.*, 1:2013-cv-01088-GMS
- *Safe Storage LLC v. StoneFly Inc.*, 1:2013-cv-01152-GMS

The '346 Patent has also been the subject of the following other *inter partes* reviews:

- *Dell Inc., Hewlett-Packard Co., & NetApp, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2013-00635 (instituted by Board decision dated March 20, 2014)

- *Dell Inc., Hewlett-Packard Co., & NetApp, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00152 (not instituted by Board decision dated May 16, 2014)
- *VMware, Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00901 (instituted by Board decision dated Dec. 11, 2014)
- *Int'l Bus. Mach. Corp. & Oracle Am., Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00949 (instituted by Board decision dated Dec. 11, 2014)
- *Int'l Bus. Mach. Corp. & Oracle Am., Inc. v. Elec. & Telecomm'n Research Inst.*, IPR2014-00976 (not instituted by Board decision dated Dec. 11, 2014)

III. COUNSEL

Lead Counsel: Matthew C. Phillips, Reg. No. 43,403

Backup Counsel: Derek Meeker, Reg. No. 53,313

IV. SERVICE INFORMATION

Matthew C. Phillips:

Electronic Mail Address: matthew.phillips@renaissanceiplaw.com

Postal Mail Address: Renaissance IP Law Group LLP

9600 SW Oak Street, Suite 560

Portland, Oregon 97223

Hand Delivery Address: Same as above.

Telephone No.: 503-964-1129

Facsimile No.: 503-517-9919

Derek Meeker:

Electronic Mail Address: derek.meeker@renaissanceiplaw.com

Postal Mail Address: Renaissance IP Law Group LLP

9600 SW Oak Street, Suite 560

Portland, Oregon 97223

Hand Delivery Address: Same as above.

Telephone No.: 360-606-8922

Facsimile No.: 503-517-9919

Counsel for the Patent Owner consent to receive service in this review by email at the email addresses listed above.

Respectfully submitted
on behalf of the Patent Owner,

Date: 2015 Jan. 29

By: DRAFT

Matthew C. Phillips
Registration No. 43,403

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.