

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FACEBOOK, INC., INSTAGRAM, LLC  
Petitioner

v.

TLI COMMUNICATIONS, LLC,  
Patent Owner

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Case IPR2015-00778  
Patent 6,038,295

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**PETITIONER'S LIST OF PROPOSED MOTIONS**

Pursuant to the Patent Trial and Appeal Board instituting trial on August 28, 2015, and in advance of the initial conference call scheduled for September 18, 2015, the Petitioner hereby discloses the following regarding proposed motions in the above-captioned IPR proceeding:

The Petitioner does not at this time request authorization to file any motions other than the motions provided in the Scheduling Order and by the Rules. The Petitioner reserves its right to seek permission to file additional motions as appropriate, based on the evidence or other materials presented by the patent owner in this proceeding.

Respectfully submitted,

Dated: September 16, 2015

/Heidi Keefe/

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Counsel for Petitioner

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**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to 37 C.F.R. § 42.6, that a copy of the attached **PETITIONER'S LIST OF PROPOSED MOTIONS** is being electronically served on the 16th day of September 2015, the same day as the filing of the above-identified document in the United States Patent and Trademark Office/Patent Trial and Appeal Board, upon counsel for the patent owner as follows:

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