

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE MANGROVE PARTNERS MASTER FUND, LTD.

Petitioner,

v.

VIRNETX, INC.,

Patent Owner.

Case IPR2015-01046

U.S. Patent No. 6,502,135

PETITIONER'S LIST OF PROPOSED MOTIONS

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

In advance of the initial conference call, Petitioner provides the following list of proposed motions:

1. Motion to file a reply to Patent Owner's Request for Rehearing.
2. Contingent Motion to Amend: A contingent motion to amend the Real Parties In Interest, should the Board determine that there are additional parties required.

Respectfully submitted,

Dated: November 5, 2015

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Abraham Kasdan
Reg. No. 32,997
WIGGIN & DANA LLP

// _____
James T. Bailey
Reg. No. 44,518
THE LAW OFFICE OF JAMES T.
BAILEY

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of THE MANGROVE MASTER FUND LTD.'S LIST OF PROPOSED MOTIONS on the counsel of record for the Patent Owner by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail to the following address:

Joseph E. Palys
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Naveen Modi
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Dated: November 5, 2015

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Abraham Kasdan
Reg. No. 32,997