

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**THE MANGROVE PARTNERS MASTER FUND, LTD.**

Petitioner,

v.

**VIRNETX, INC.,**

Patent Owner.

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Case IPR2015-01047

U.S. Patent No. 7,490,151

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**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

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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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