

Filed on behalf of: VirnetX Inc.

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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 IPR2015-01047
Patent No. 7,490,151

Patent Owner's List of Proposed Motions

Pursuant to the Board's Decision (Paper No. 11, October 7, 2015) instituting an *inter partes* review of U.S. Patent No. 7,490,151 and the Scheduling Order (Paper No. 12, October 7, 2015) directing the parties to contact the Board within a month of the Board's Decision regarding any proposed motions, Patent Owner proposes to file the following motion:

Motion for additional discovery with respect to the real-parties-in-interest.

Respectfully submitted,

Dated: November 6, 2015

By: /Joseph E. Palys/
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Registration No. 46,508

Counsel for VirnetX Inc.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on the counsel for Petitioner a true and correct copy of the foregoing Patent Owner's List of Proposed Motions by electronic means on the date below at the following address of record:

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