

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC., AND
MICRON MEMORY JAPAN, INC.,
Petitioners

v.

MASSACHUSETTS INSTITUTE OF TECHNOLOGY,
Patent Owner

Case IPR2015-01087
U.S. Patent No. 6,057,221

PATENT OWNER'S NOTICE OF LIST OF PROPOSED MOTIONS

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The undersigned, on behalf of Massachusetts Institute of Technology (“MIT” or “Patent Owner”), hereby provides Notice to the Board that the attached list of proposed motions to be filed was served to Micron Technology, Inc., and Micron Memory Japan, Inc. (“Micron” or “Petitioner”) pursuant to 37 C.F.R. § 42.21(a). *See also* Trial Practice Guide, 77 Fed. Reg. 48756, 48765 (Aug. 14, 2012).

Date: December 14, 2015

Respectfully submitted,

by: */Steven J. Pollinger/*
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The Patent Trial and Appeal Board ("Board") issued a decision on November 5, 2015 instituting Inter Partes Review of U.S. Patent No. 6,057,221, assigned Case IPR2015-01087. The Board scheduled an initial conference call for Wednesday, December 16, 2015 at 3:30pm Eastern Time. Pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (Aug. 14, 2012), Massachusetts Institute of Technology ("MIT" or "Patent Owner") submits the following list of proposed motions it is currently considering filing. This list is provided without prejudice to MIT's right to seek authorization to file additional motions or to decide not to file motions listed.

I. Motion to Exclude Evidence

Pursuant to 37 C.F.R. § 42.64(c), MIT reserves the right to file a motion to exclude evidence. While such a motion is automatically authorized, MIT identifies such a motion to preserve its right to file it.

II. Motion for Observations on Cross-Examination

Pursuant to 37 C.F.R. § 42.20(a), MIT reserves the right to file a motion for observations on cross-examination. MIT identifies potentially filing such a motion to preserve its right.

III. Motion for Admission *Pro Hac Vice*

Pursuant to 37 C.F.R. § 42.10(c), MIT reserves the right to file a motion for one additional counsel to appear *pro hac vice*. While such a motion is automatically authorized, MIT identifies potentially filing such a motion to preserve its right.

IV. Motion to Modify the Scheduling Order

MIT expects to request, in light of the number of claims at issue, and the intervening holidays, that the due date for Patent Owner's response be extended from January 20, 2016 to February 17, 2016. MIT expects to request that the deadline for cross examination be extended from January 13, 2016 to January 27, 2016.

V. Motion to Seal

Pursuant to 37 C.F.R. § 42.14, MIT reserves the right to file a motion to seal certain confidential documents or things. While such a motion is automatically authorized, MIT identifies potentially filing such a motion to preserve its right.

Date: December 14, 2015

Respectfully submitted,

by: */Steven J. Pollinger/*
Steven J. Pollinger
Registration No. 35,326
Ramzi R. Khazen
Registration No. 55,810

Counsel for Massachusetts Institute of
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