

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UMICORE AG & CO. KG,
Petitioner

v.

BASF Corporation,
Patent Owner

Case IPR2015-01123
Patent Number: 8,404,203

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Patent Owner, BASF Corporation, hereby submits the following list of proposed motions that it may file, as circumstances warrant, during this trial.

Petitioner's proposed motions are as follows:

1. Motion to submit supplemental information under 37 C.F.R. § 42.123 (if necessary).
2. Motion to seal and/or for a protective order regarding confidential information pursuant to 37 C.F.R. §§ 42.14, 42.54, and 42.55 (if necessary).
3. Motion to exclude evidence pursuant to 37 C.F.R. § 42.64(c) (if necessary).
4. Motion to expunge evidence (if necessary).
5. Motion for discovery or additional discovery pursuant to 37 C.F.R. § 42.51 (if necessary).
6. Request for an oral hearing pursuant to 37 C.F.R. § 42.70(a).
7. Motion for observations on cross-examination (if applicable).
8. Motion for additional discovery (if warranted).
9. Motion to amend claims pursuant to 37 C.F.R. § 42.121(a).

This list is provided without prejudice to Petitioner's right to seek authorization to file additional motions or to elect not to file the motions listed.¹

¹ "Submission of a list [of proposed motions] would not preclude the filing of additional motions not contained in the list." *See* Official Gazette of United States

Case IPR2015-01123
U.S. Patent No. 8,404,203

Date: November 25, 2015

Respectfully submitted,

/Anish R. Desai/

Brian E. Ferguson (Reg. 36,801)
Anish R. Desai (Reg. No. 73,760)
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005
Phone: 202-682-7000

Patent and Trademark Office, Volume 1376, Number 2, at page 259 (March 13,
2012).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 25, 2015, the foregoing **PATENT OWNER'S LIST OF PROPOSED MOTIONS** was served via electronic mail, upon the following:

Elizabeth Gardner
Kenyon & Kenyon LLP
One Broadway
New York, NY 10004-1004
T: 212-425-7200
egardner@kenyon.com

Richard L. DeLucia
Kenyon & Kenyon LLP
One Broadway
New York, NY 10004-1004
T: 212-425-7200
rdelucia@kenyon.com

/Timothy J. Andersen/ _____
Timothy J. Andersen
Case Manager
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005
T: 202-682-7075
timothy.andersen@weil.com