

Filed on behalf of Seymour Levine

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE BOEING COMPANY.
Petitioner,

v.

SEYMOUR LEVINE
Patent Owner

Case IPR2015-01341
U.S. Patent No. RE39,618

PATENT OWNER'S LIST OF PROPOSED MOTIONS

The Patent Trial and Appeal Board instituted an IPR trial in case number IPR2015-01341 on December 21, 2015 (Institution Decision, Paper 10). In advance of the initial conference call scheduled for Friday, January 15, 2016, Patent Owner Seymour Levine hereby provides a list of the proposed motions it may file in the above-captioned *inter partes* review proceeding.

Although motions for *pro hac vice* admission have been authorized in Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 5 at 2), Patent Owner identifies its proposed motions here to preserve the right to file them and to inform the Board of the motions it may file. Patent Owner reserves the right to seek permission to file additional motions not listed below pursuant to the Board's authorization.

PATENT OWNER'S PROPOSED MOTIONS

1. Motions for *pro hac vice* admission;
2. Motions for observation on cross examination;
3. Motion to request oral argument/hearing;
4. Motions for additional discovery; and

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5. Additional motions as permitted by the Board trial rules and procedures, or as authorized by the Board.

Date: January 13, 2016

Respectfully submitted,

By: /Bruce R. Zisser, Reg. No. 40,884/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S LIST OF PROPOSED MOTIONS** was served electronically via e-mail on January 13, 2016, in its entirety on the following:

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