Case IPR2015-01364 Patent 6,101,534

Paper No. 11 Filed: January 8, 2016

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY COMPUTER ENTERTAINMENT AMERICA LLC, Petitioner,

v.

ROTHSCHILD DIGITAL MEDIA INNOVATIONS, LLC, Patent Owner.

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Case IPR2015-01364 Patent 6,101,534

## PATENT OWNER'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



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Pursuant to the notice of practice guide published at 77 Fed. Reg. 48,755,

47,765 (Aug. 14, 2012) (codified at 37 C.F.R. pt. 42), and in view of the initial

conference call contemplated by the Scheduling Order (see Paper No. 9 at 6),

Patent Owner advises the Board and Petitioner that Patent Owner does not

currently anticipate the filing of any motions that would be ripe for discussion

during the initial conference call. Patent Owner nonetheless observes as follows:

1. Counsel for both parties have discussed a stipulated modification of the

Scheduling Order as to Due Dates 1, 2 and 3. Petitioner has not yet authorized the

stipulation. Patent Owner believes there should be no impediment to stipulation,

but cannot rule out the need to pursue motion practice.

2. On January 5, 2016, by agreement of the parties, and as directed upon

telephone inquiry to Board staff member Maria Vignone, counsel for Patent Owner

submitted a request to trials@uspto.gov for a one-week modification of Due Date 7

(oral argument) to August 23, 2016, due to a calendar conflict.

3. Patent Owner reserves the right to pursue a motion to amend, as to which

a different conference-call deadline applies (see Paper No. 9 at 3).

Respectfully submitted,

Date: January 8, 2016 /Thomas K. Landry/

Thomas K. Landry, Lead Counsel

Registration No. 33,939

Telephone: (305) 372-7474



## CERTIFICATE OF SERVICE UNDER 37 C.F.R. §§ 42.6(e)

Pursuant to 37 C.F.R. §§ 42.6(e), I certify that I caused to be served electronically by agreement of the parties on this 8th day of January 2016, a true and correct copy of the foregoing Patent Owner's List of Proposed Motions on counsel of record for Petitioner as follows:

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Dated: January 8, 2016 Respectfully submitted,

/Thomas K. Landry/

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