

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

T-MOBILE US, INC., T-MOBILE USA, INC.,
TELECOMMUNICATION SYSTEMS, INC., ERICSSON INC., and
TELEFONAKTIEBOLAGET LM ERICSSON
Petitioners,

v.

TRACBEAM, LLC,
Patent Owner

Case No. IPR2015-01709
Patent 7,525,484

**JOINT SUBMISSION OF NARROWING AGREEMENT
UNDER 37 U.S.C. § 317**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74, Petitioners T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson (collectively “Petitioners”) and Patent Owner TracBeam, LLC (“Patent Owner”) jointly submit a signed and binding Narrowing Agreement, memorializing their agreement to narrow their disputes relating to Patent Owner’s patents, including the present proceeding.

The agreement recites certain confidential and sensitive business information of both Petitioners and Patent Owner. Accordingly, the parties jointly request that the Board treat this agreement (Exhibit 2001) as business confidential information, maintain the agreement separate from the file of the involved patent, and make the agreement available only as necessary and permitted under 35 U.S.C. §317(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

Date: November 24, 2015

By: /Sean Luner/

Sean Luner
Registration No. 36,588
DOVEL & LUNER, LLP
201 Santa Monica Blvd, Suite 600
Santa Monica, CA 90401
Main Telephone (310) 656-7066
sean@dovel.com
Counsel for Patent Owner

/s/ Bryan W. Oaks (with permission)

Brian W. Oaks

Reg. No. 44,981

BAKER BOTTS LLP

98 San Jacinto Blvd., Suite 1500

Austin, TX 78701

Phone: (512) 322-5470

Fax: (512) 322-

3621 brian.oaks@bakerbotts.com

Counsel for Petitioners

CERTIFICATE OF FILING AND SERVICE

I hereby certify that true and correct copies of the foregoing **JOINT SUBMISSION OF NARROWING AGREEMENT UNDER 37 U.S.C. § 317 AND EXHIBIT 2001** are being filed via PRPS and served by electronic mail this 24th day of November, 2015 on counsel for Petitioners as follows:

Brian W. Oaks
BAKER BOTTS, LLP,
98 San Jacinto Blvd., Suite 1500
Austin, TX 78701
Telephone (512) 322-5470
Facsimile (512) 322-3621
brian.oaks@bakerbotts.com

Douglas M. Kubehl
BAKER BOTTS, LLP,
2001 Ross Avenue
Dallas, TX 75201
Telephone (214) 953-6486
Facsimile (214) 661-4486
doug.kubehl@bakerbotts.com

Chad C. Walters
BAKER BOTTS, LLP,
2001 Ross Avenue
Dallas, TX 75201
Telephone (214) 953-6511
Facsimile (214) 661-4511
chad.walters@bakerbotts.com

Ross G. Culpepper
BAKER BOTTS, LLP,
2001 Ross Avenue
Dallas, TX 75201
Telephone (214) 953-6543
Facsimile (214) 661-4543

ross.culpepper@bakerbotts.com

Date: November 24, 2015

/Sean Luner/

Sean Luner

Registration No. 36,588

DOVEL & LUNER, LLP

201 Santa Monica Blvd, Suite 600

Santa Monica, CA 90401

Main Telephone (310) 656-7066

sean@dovel.com

Counsel for Patent Owner