

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

TDK CORPORATION,  
Petitioner,

v.

LAMBETH MAGNETIC STRUCTURES, LLC,  
Patent Owner.

---

Case No. IPR2016-00013  
Patent No. 7,128,988

---

**PATENT OWNER'S AMENDED MANDATORY NOTICES  
PURSUANT TO 37 C.F.R. § 42.8**

Pursuant to 37 CFR § 42.8, Patent Owner Lambeth Magnetic Structures, LLC (“Lambeth”) hereby provides the following amended notice to reflect the change in information regarding Lambeth’s lead and back-up counsel and revised service information. The remaining information remains unchanged, but is nonetheless reproduced herein for the Board’s convenience.

**I. REAL PARTY-IN-INTEREST**

Lambeth Magnetic Structures, LLC, the assignee of record for U.S. Patent No. 7,128,988 (“the ‘988 patent”) is the real party-in-interest.

**II. RELATED MATTERS**

Lambeth has sued Toshiba Corporation, Toshiba America Information Systems, Inc., Toshiba America Electronic Components, Inc. and Toshiba of Canada, Ltd. (collectively “Toshiba”) for infringement of claims 1, 3, 6, 8, 11, 12, 17, 19, 23, 27, 28 and 29 of the ‘988 Patent in the United States District Court for the Western District of Pennsylvania. *See Lambeth Magnetic Structures, LLC v. Toshiba Corp.*, Civil Action No. 2:14-cv-01526-CB (W.D. Pa.) (“Pennsylvania Action”). On October 9, 2015, Headway Technologies, Inc. (“Headway”), a supplier to Toshiba of products accused of infringement in the Pennsylvania Action, filed an action seeking a declaration of non-infringement of the ‘988 Patent in the United States District Court for the Central District of California. *See Headway Technologies, Inc. v. Lambeth Magnetic Structures, LLC*, Civil Action

No. 2:15-cv-07987-SJO (PLAx) (C.D. Ca.) (“California Action”).

On October 12, 2015, Lambeth filed a motion seeking leave to amend its complaint in the Pennsylvania Action to add TDK Corporation, TDK U.S.A. Corporation (“TDK USA”), TDK Corporation of America, Headway, Husko, Inc. (“Husko”), and SAE Magnetics (H.K.) Ltd. (“SAE”) as defendants in the Pennsylvania Action. SAE and Headway are direct or indirect wholly owned subsidiaries of TDK Corporation. On November 4, 2015, the Court granted the parties’ Joint Motion to Stay Deadlines, ordering the Pennsylvania Action stayed and administratively closed, and denied Lambeth’s motion seeking leave to amend its complaint without prejudice. On March 11, 2016, Lambeth filed a motion seeking to dismiss the California Action for lack of personal jurisdiction, or in the alternative, for transfer to the Western District of Pennsylvania.

### III. LEAD AND BACK-UP COUNSEL

<b>Lead Counsel:</b>	<b>Back-Up Counsel:</b>
David C. Radulescu, Ph.D. Registration No. 36,250 david@radulescullp.com  RADULESCU LLP 350 Fifth Avenue, Suite 6910 New York, NY 10118 Telephone: (646) 502-5950 Facsimile: (646) 502-5959	Joseph M. Mercadante Registration No. 64,077 joseph@radulescullp.com  RADULESCU LLP 350 Fifth Avenue, Suite 6910 New York, NY 10118 Telephone: (646) 502-5950 Facsimile: (646) 502-5959

#### IV. SERVICE INFORMATION

Please address all correspondence to the lead and back-up counsel at the address shown above. Petitioner also consents to electronic service by email at: david@radulescullp.com, joseph@radulescullp.com, and paralegals@radulescullp.com.

#### V. POWER OF ATTORNEY

A power of attorney accompanies this mandatory notice disclosure.

Date: March 22, 2016

Respectfully submitted,

/Orville R. Cockings/

Orville R. Cockings

Registration No. 42,424

ocockings@lernerdavid.com

LERNER, DAVID, LITTENBERG,  
KRUMHOLZ & MENTLIK, LLP  
600 South Avenue West  
Westfield, New Jersey 07090  
Telephone: (908) 654-5000

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Amended Mandatory Notices Pursuant to 37 C.F.R. § 42.8 and the associated Patent Owner's Power of Attorney were served via email on March 22, 2016 on the attorneys for the Petitioner:

<b>Lead Counsel:</b>	<b>Back-Up Counsel:</b>
Hector Gallegos Registration No. 40,614 hgallegos@mofo.com  MORRISON & FOERSTER, LLP 200 Pennsylvania Avenue, NW Suite 6000 Washington, D.C. 20006-1888 Telephone: (202) 887-6920 Facsimile: (202) 887-0763	Jonathan Bockman Registration No. 45,640 jbockman@mofo.com  MORRISON & FOERSTER, LLP 1650 Tysons Boulevard, Suite 400 McLean, VA 22102-4220 Telephone: (703) 760-7769 Facsimile: (703) 760-7777

/Orville R. Cockings/

Orville R. Cockings  
Registration No. 42,424