

Patent No. 7,128,988
Inter Partes Review
Attorney Docket No. LMBTH 7.1O-001

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

TDK CORPORATION
Petitioner

v.

LAMBETH MAGNETIC STRUCTURES LLC
Patent Owner

INTER PARTES REVIEW OF U.S. PATENT NO. 7,128,988
Inter Partes Review No. 2016-00013

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

Mail Stop: Patent Board
Patent Trial and Appeal Board
U.S. Patent And Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. MANDATORY NOTICES

Lambeth Magnetic Structures, LLC, the Patent Owner, provides the following mandatory notices pursuant to 37 C.F.R. §42.8.

A. Real Party-In- Interest Under 37 C.F.R. § 42.8(b)(1)

Lambeth Magnetic Structures, LLC (“Lambeth”), the assignee of record for U.S. Patent 7,128,988 (“the ‘988 Patent”), is the real party-in-interest.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

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 for components included in the accused products in the Pennsylvania Action 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-DSF (C.D. Ca.). 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, Husko and Headway are direct or indirect wholly owned subsidiaries of TDK Corporation.

C. Lead And Backup Counsel Under 37 C.F.R. § 42.8(b)(3)

Lead Counsel:	Backup Lead Counsel:
Orville R. Cockings (Reg. No. 42,424) ocockings@lernerdavid.com	Dr. Gregory J. Gonsalves (Reg. No. 43,639) gonsalves@gonsalveslawfirm.com
<u>Postal and Hand-Delivery Address</u> 600 South Avenue West Westfield, NJ 07090 Telephone: (908) 518-6397 Fax: (908) 654-7866	<u>Postal and Hand-Delivery Address</u> 2216 Beacon Lane Falls Church, Virginia 22043 Telephone: (571) 419-7252

D. Service Information Under 37 C.F.R. § 42.8(b)(4)

Please address all correspondence to the lead and backup counsel at the address shown above. Petitioner also consents to electronic service by e-mail at: litigation@lernerdavid.com, ocockings@lernerdavid.com, asolo@lernerdavid.com.

II. POWER OF ATTORNEY

A power of attorney accompanies this mandatory notice disclosure.

Dated: November 19, 2015

Respectfully submitted,
Electronic signature:
/Orville R. Cockings/
Orville R. Cockings
Registration No.: 42,424
Counsel for Patent Owner
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, New Jersey 07090
(908) 654-5000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8**, including the Patent Owner's Power of Attorney, was served in its entirety on November 19, 2015, by emailing a copy to the attorneys of record for the Petitioner TDK Corporation at the below email addresses:

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

By: /Orville R. Cockings/
Orville R. Cockings
Registration No. 42,424
Counsel for Petitioner
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, New Jersey 07090
(908) 654-5000