

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

SUMMIT 6 LLC
Patent Owner

CASE: IPR2016-00029
Patent No. 7,765,482

Title: Web-Based Media Submission Tool

**PATENT OWNER'S RESPONSE TO
PETITIONER'S MOTION FOR JOINDER**

Patent Owner Summit 6 respectfully does not oppose Samsung's Motion for Joinder (Paper No. 3). Because Samsung's Petition, legal theories, and analysis are identical to those in IPR2015-00806, no additional discovery will be required if joinder is allowed. Because Samsung will not submit any separate filings unless and until Google settles with Summit 6 or the proceeding in IPR2015-00806 is otherwise terminated by Google, judicial economy will be served by granting Samsung's Motion for Joinder.

Dated: November 9, 2015

/Peter J. Ayers/
Peter J. Ayers, Reg. No. 38,374
Email: peter@leehayes.com
John Shumaker, No. 52,223
Email: jshumaker@leehayes.com
Brian Mangum, Reg. No. 64,224
Email: brianm@leehayes.com
LEE & HAYES, PLLC
11501 Alterra Parkway, Suite 450
Austin, TX 78758
Phone: (512) 605-0252
Facsimile: (512) 605-0252

*Attorneys for Patent Owner
Summit 6 LLC*

IPR2016-00029
U.S. Pat. No. 7,765,482

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 2015, the foregoing Patent Owner's Response to Petitioner's Motion for Joinder was served on lead and back-up counsel for Samsung Electronics Co., Ltd., by sending the same by electronic means to:

Brian K. Erickson
DLA Piper LLP (US)
401 Congress Avenue, Suite 2500
Austin, TX 78701
Samsung_Summit-IPR@dlapiper.com

James M. Heintz
DLA Piper LLP (US)
11911 Freedom Drive, Suite 300
Reston, VA 20190
Samsung_Summit-IPR@dlapiper.com

And a copy being electronically served on counsel for Petitioner in related case No. IPR2015-00806:

John Alemanni, Reg. No. 47,384
Lead Counsel
Kilpatrick Townsend & Stockton LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400
JAlemanni@kilpatricktownsend.com

Michael Morlock, Reg. No. 62,245
Back-up Counsel
Kilpatrick Townsend & Stockton LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400
MMorlock@kilpatricktownsend.com

/Peter J. Ayers/
Peter J. Ayers, Reg. No. 38,374