

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,

Petitioner,

v.

IRONBURG INVENTIONS LTD.,

Patent Owner.

Case IPR2016-00948

Patent 8,641,525

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765-66 (August 14, 2012), in advance of the initial conference call scheduled for Wednesday, October 26, 2016, Patent Owner Ironburg Inventions Ltd.

(“Ironburg”) hereby submits the following list of proposed motions it is currently contemplating filing. Although motions to amend claims, motions to exclude evidence and motions for observations on cross-examination have been authorized by the Board, Ironburg identifies such motions here to preserve its right to file them. This list is provided without prejudice to Patent Owner’s right to seek authorization to file additional motions pursuant to the Board's authorization or to refrain from filing the motions listed herein.

1. A motion to amend the claims of the patent at issue pursuant to 37 C.F.R. § 42.121(a);
2. A motion to exclude evidence pursuant to 37 C.F.R. § 42.64(c) based at least on the grounds set forth in Patent Owner’s Objections in its Preliminary Response to Petitioner’s Evidence;
3. A motion to compel deposition dates and location of declarant in United States;
4. A motion for additional discovery pursuant to 37 C.F.R. § 42.51;
5. A motion to submit supplemental information pursuant to 37 C.F.R. § 42.123; and

6. A motion to seal, containing a proposed protective order, in the event that Ironburg determines that it intends to rely upon confidential information during the trial phase of this *Inter Partes* Review proceeding.

Date: October 24, 2016

Respectfully submitted,

By: /s/ Ehab M. Samuel

Ehab Samuel

Attorney for Patent Owner

Reg. No. 57,905

Danielle Mihalkanin

Attorney for Patent Owner

Reg. No. 69,506

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on October 24, 2016, a complete and entire electronic copy of this Petitioner's List of Proposed Motions for Inter Partes Review No. 2016-00948, was served PTAB E2E to Petitioner's counsel of record at the following address:

Joshua C. Harrison, Reg. No. 45,686, josh@bhiplaw.com
Reynaldo C. Barcelo, Reg. No. 42,290, rey@bhiplaw.com

Date: October 24, 2016

Respectfully submitted,

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