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Filed on behalf of Unified Patents Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

ADVANCED SILICON TECHNOLOGIES, LLC
Patent Owner

IPR2016-01060
Patent 8,933,945

**PETITION FOR *INTER PARTES* REVIEW OF
US PATENT NO. 8,933,945
CHALLENGING CLAIMS 1-3, 9, 10, AND 21
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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I. MANDATORY NOTICES

A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Unified Patents Inc. (“Unified” or “Petitioner”) certifies that Unified is the real party-in-interest, and further certifies that no other party exercised control or could exercise control over Unified’s participation in this proceeding, the filing of this petition, or the conduct of any ensuing trial. In this regard, Unified has submitted voluntary discovery. *See* EX1015 (Petitioner’s Voluntary Interrogatory Responses).

B. Related Matters

US Pat. No. 8,933,945 (“’945 Patent” (EX1001)) is owned by Advanced Silicon Technologies, LLC (“AST” or “Patent Owner”). On December 21, 2015, AST filed lawsuits in the US District Court for the District of Delaware against multiple companies, claiming that these companies’ products and/or services infringe the ’945 Patent. AST also filed a Section 337 Action in the International Trade Commission on December 27, 2015 against multiple companies, seeking to exclude from importation certain components and products incorporating computing and graphics systems that allegedly infringe the ’945 Patent.

C. Counsel

David L. Cavanaugh (Reg. No. 36,476) will act as lead counsel; Jonathan Stroud (Reg. No. 72,518) and Daniel Williams (Reg. No. 45,221) will act as back-up counsel.

D. Service Information, Email, Hand Delivery and Postal

Unified consents to electronic service at david.cavanaugh@wilmerhale.com and jonathan@unifiedpatents.com. Petitioner can be reached at Wilmer Cutler Pickering Hale and Dorr, LLP, 1875 Pennsylvania Ave., NW, Washington, DC 20006, Tel: (202) 663-6000, Fax: (202) 663-6363, and Unified Patents Inc., 1875 Connecticut Ave. NW, Floor 10, Washington, DC 20009, (650) 999-0899.

II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)–(2), Petitioner challenges claims 1-3, 9, 10, and 21 of the '945 Patent.

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