

Filed on behalf of YMax Corporation

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YMAX CORPORATION,
Petitioner

v.

FOCAL IP, LLC
Patent Owner

Case IPR2016-01260
U.S. Patent No. 8,457,113

**PETITIONER'S OPPOSITION TO
PATENT OWNER'S MOTION TO AMEND**

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TABLE OF AUTHORITIES

CASES

EcoWater Sys. LLC v. Culligan Int’l Co.,
IPR2013-00155, Paper 18 (PTAB June 24, 2014)4

Thermalloy, Inc. v. Aavid Eng’g, Inc.,
121 F.3d 691, 692 (Fed. Cir. 1997)11

STATUTES AND RULES

37 C.F.R. § 42.121 (a)(2)(i)9

37 C.F.R. § 42.121(a)(2)(ii)3

LIST OF EXHIBITS

YMax Exh.	Description
1001	U.S. Patent No. 8,457,113 to Wood <i>et al.</i> (the “113 patent”)
1002	Declaration of Tal Lavian, Ph.D.
1003	U.S. Patent No. 6,463,145 to O’Neal <i>et al.</i> (“O’Neal”)
1004	U.S. Patent No. 5,958,016 to Chang <i>et al.</i> (“Chang”)
1005	International Publication No. WO 99/14924 to Shtivelman <i>et al.</i> (“Shtivelman”)
1006	Prosecution History of U.S. Patent No. 6,529,596
1007	Prosecution History of U.S. Patent No. 7,764,777
1008	Federal Standard 1037C (Glossary of Telecommunications Terms) (Aug. 7, 1996)
1009	Newton’s Telecom Dictionary (February 1999)
1010	http://www.Internetlivestats.com/total-number-of-websites
1011	Plug-in Basics – Plugins
1012	<i>Exhibit Number not used</i>
1013	http://www.thefreelibrary.com/eBay’s+AuctionWeb+Tops+One+Million+Bids%3B+Leading+Online+Auction...-a018940197
1014	Exhibit Number not used
1015	U.S. Patent No. 6,031,836 to Haserodt
1016	Curriculum vitae for Tal Lavian, Ph.D.
1017	ITU-T Recommendation Q.700-Q.705. Introduction to CCITT Signaling System Number 7. Melbourne 1988-1992
1018	http://www.speakfreely.org/history.html
1019	1019 Office Action Response in the Prosecution History of U.S. Patent No. 8,848,894, dated September 13, 2013
1020	Prosecution History of the ‘113 Patent
1021	W. Bressler, SS7 Level Two over IP, dated January 1999
1022	Lucent Technologies and Ascend Communications announce voice

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