

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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KINGSTON TECHNOLOGY COMPANY INC.,  
Petitioner,

v.

POLARIS INNOVATIONS LTD.,  
Patent Owner.

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Case IPR2016-01622  
Patent 6,850,414 B2

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**PATENT OWNER POLARIS INNOVATIONS LTD.'S  
NOTICE OF PROPOSED MOTIONS**

An initial conference call is scheduled for March 15, 2017, at 2:00 PM (ET).  
*See* Scheduling Order (Paper 8) at 6. Pursuant to the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 66 (Aug. 14, 2012), Patent Owner Polaris Innovations Ltd. hereby submits the following list of proposed motions.

Motion to Amend the Patent (37 C.F.R. § 42.121). As authorized in the Scheduling Order (Paper 8) at 5, Patent Owner plans to file a motion to amend. Consistent with the Board's practice and 37 C.F.R. § 42.121, a conference call will be made to the Board to confer regarding the proposed motion to amend and the specific amendments contemplated before filing the motion.

Although Patent Owner does not presently expect to file additional motions, it reserves the right to seek subsequent authorization for motions consistent with the Board's Rules. *See* Office Patent Trial Practice Guide, 77 Fed. Reg. at 48765 ("Submission of a list would not preclude the filing of additional motions not contained in the list."); *eBay, Inc. v. MoneyCat Ltd.*, CBM2014-00091 *et al.*, Paper 21, at 4 (P.T.A.B. Nov. 12, 2014). To the extent the Board authorizes Petitioner to file any motions, Patent Owner requests authorization to submit an opposition.

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Respectfully submitted,

/ Kenneth J. Weatherwax /

Kenneth J. Weatherwax, Reg. No. 54,528  
Lowenstein & Weatherwax LLP

Date: March 13, 2017

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the following documents were served on the date stated below by electronic service by agreement between the parties:

**PATENT OWNER POLARIS INNOVATIONS, LTD'S  
NOTICE OF PROPOSED MOTIONS**

The names and address of the parties being served are as follows:

IPR37307-0007IP1@fr.com (David Hoffman)

IPR@sjclawpc.com (Martha Hopkins)

Respectfully submitted,

/ Shawn Chi /

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Date: March 13, 2017