

By: Justin J. Lesko (justinlesko@patentit.com)
Reg. No. 69,643

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION, GLOBALFOUNDRIES U.S., INC.,
MICRON TECHNOLOGY, INC., AND
SAMSUNG ELECTRONICS COMPANY, LTD.,

Petitioners

v.

DANIEL L. FLAMM,

Patent Owner

CASE IPR2017-0391¹
U.S. Patent No. 6,017,221

**PATENT OWNER'S UNOPPOSED MOTION TO FILE
AMENDED PATENT OWNER RESPONSE**

Mail Stop: PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

¹ Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01746

I. Relief Requested

With the Board's authorization for this motion by email dated February 28, 2018 and at oral hearing on March 7, 2018, Patent Owner Daniel L. Flamm, by its attorney, respectfully requests that the Board enter the attached amended Patent Owner Response in this proceeding.

II. Statement of Facts Showing Good Cause for the Board to Enter the Corrected Patent Owner Response

Patent Owner timely filed a Patent Owner Response in this matter pursuant to 37 C.F.R. § 42.120 on September 6, 2017 (Paper 13).

It recently came to the attention of Patent Owner's counsel that Paper 13 as filed includes clerical and typographical errors in several of its citations to the Exhibits, including citations to Exhibit 1001, Exhibit 1006, Exhibit 2001, and Exhibit 2003, as well as "*Id.*" citations that require clarification.

Accordingly, in the interest of justice and to assist the Board with its consideration of the Patent Owner Response, Patent Owner provides herewith an amended Patent Owner Response that corrects these typographical citation errors. For the Board's convenience, a redline of the changes made relative to Patent Owner's Response filed on September 6, 2017 (Paper 13) is also provided with this motion.

In accordance with the February 28 email from the Board authorizing this

motion, Patent Owner's proposed amendments to the brief "correct[] obvious clerical errors" and "are limited to one-for-one replacement." None of the corrections provide additional supporting citations beyond what was already set forth in the original Patent Owner Response. Patent Owner also does not expand existing citations by citing additional support.

Petitioner does not oppose this motion.

III. Conclusion

Patent Owner respectfully requests that the Board grant its motion and enter and consider the amended Patent Owner Response provided herewith.

Respectfully Submitted,

Date: March 8, 2018

By: /Justin J. Lesko, reg. no. 69,643/
Justin J. Lesko, reg. no. 69,643

Law Offices of Steve G. Lisa, Ltd.
7689 E Paradise Lane, Suite 2
Scottsdale, AZ 85260
Email: justinlesko@patentit.com

Counsel for Daniel L. Flamm

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S MOTION TO FILE AMENDED PATENT OWNER RESPONSE** was served by electronic mail on this day, March 8, 2018, on the following individuals:

Jonathan McFarland
JMcfarland@perkinscoie.com
PERKINS COIE LLP
1201 Third Ave., Suite 4900
Seattle, WA 98101
(206) 359-8000

David M. Tennant
dtennant@whitecase.com
WHITE & CASE LLP
701 Thirteenth St., NW
Washington, DC 20005
(202) 626-3600

Daniel Keese
DKeese@perkinscoie.com
PERKINS COIE LLP
1120 NW Couch St., 10th Floor
Portland, OR 97209
(503) 727-2000

Nathan Zhang
nathan.zhang@whitecase.com
WHITE & CASE LLP
3000 El Camino Real
5 Palo Alto Square, 9th Floor
Palo Alto, CA 94306
(650) 213-0300

Chad S. Campbell
CSCampbell@perkinscoie.com
Tyler Bowen
TBowen@perkinscoie.com
PERKINS COIE LLP
2901 North Central Ave., Suite 2000
Phoenix, AZ 85012
(602) 351-8000

WCGlobalFoundries-FlammTeam@whitecase.com

*Counsel for GLOBALFOUNDRIES
U.S., Inc.*

Intel-Flamm-Service-IPR@perkinscoie.com

Counsel for Intel Corporation

Jared Bobrow

Jared.bobrow@weil.com

Jeremy Jason Lang

Jeremy.lang@weil.com

WEIL, GOTSHAL & MANGES LLP

201 Redwood Shores, CA 94065

(650) 802-3000

Micron.flamm.service@weil.com

Counsel for Micron Technology, Inc.

Naveen Modi

naveenmodi@paulhastings.com

Joseph E. Palys

josephpalys@paulhastings.com

Chetan R. Bansal

chetanbansal@paulhastings.com

Paul Hastings LLP

875 15th Street, N.W.

Washington, D.C. 20005

(202) 551-1700

[PH-Samsung-Flamm-](mailto:PH-Samsung-Flamm-IPR@paulhastings.com)

IPR@paulhastings.com

*Counsel for Samsung Electronics
Company, Ltd.*

By: /Justin J. Lesko, reg. no. 69,643/