

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG Electronics, Inc.,
Petitioner,

v.

Papst Licensing GmbH & Co. KG,
Patent Owner.

Case IPR2017-00678
Patent 8,504,746

**PAPST LICENSING GMBH & CO. KG'S
RESPONSE TO PETITIONER'S MOTION FOR JOINDER**

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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

In response to Petitioner LG Electronics' Motion for Joinder (Paper No. 3), Patent Owner Papst Licensing GmbH & Co. KG ("Papst") does not oppose Petitioner's motion to join IPR2017-00678 with IPR2016-01211 on the condition that the consolidated proceeding is limited to the instituted grounds of IPR2016-01211, and subject to the conditions agreed to by LG in its motion, including its agreement to abide by the current schedule, to consolidate filings and discovery with the Canon petitioners, to refrain from seeking any discovery beyond that sought by the Canon petitioners, and to assume a subordinate, understudy role.

In view of the above, and to allow the Board to issue a decision on joinder and the Petition, Papst hereby waives its right to file a Preliminary Response in this proceeding, while reserving its right to do so if joinder is denied.

Respectfully submitted,
FITCH EVEN TABIN & FLANNERY LLP

Dated: May 1, 2017

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Papst Licensing GmbH & Co. KG's Response to Petitioner's Motion for Joinder was served electronically via email on May 1, 2017, in its entirety on the following counsel of record for Petitioner:

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