

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Olympus Corporation, Olympus America Inc.,
Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.,
Petitioner,

v.

Papst Licensing GmbH & Co. KG,
Patent Owner.

Case IPR2017-01808
Patent 6,470,399 B2

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

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

In response to Petitioners' Motion for Joinder (Paper No. 4), Patent Owner Papst Licensing GmbH & Co. KG ("Papst") submits it does not oppose Petitioner's motion to join IPR2017-01808 with IPR2017-00714 on the condition that the consolidated proceeding is limited to the instituted grounds of IPR2017-00714, and subject to the conditions agreed to by Petitioners in their motion, including their agreement to abide by the current schedule, to consolidate filings and discovery with the ZTE petitioners, to refrain from seeking any discovery beyond that sought by the ZTE 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: August 21, 2017

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Papst Licensing GmbH & Co. KG's Response to Petitioners' Motion for Joinder was served electronically via email on August 21, 2017, in its entirety on the following counsel of record for Petitioner:

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