

Filed: May 17, 2018

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner

v.

VILOX TECHNOLOGIES LLC,
Patent Owner

Case IPR2018-00044
Patent No. 7,302,423 B2

PATENT OWNER'S NOTICE OF DEPOSITION OF DR. GREENSPUN

1. Pursuant to 37 C.F.R. §42.53, Patent Owner Vilox Technologies, LLC, by and through its counsel, shall take the deposition of Dr. Philip Greenspun. The Parties have agreed the deposition is to be held at the Law Offices of Haynes Boone LLC, 30 Rockefeller Center, New York, NY, on May 24, 2018. The deposition will be conducted before an officer authorized to administer oaths. The deposition will be recorded by stenographic and/or videographic means. All counsel of record are invited to attend this deposition.
2. Patent Owner intends to rely on the Exhibits and Documents previously filed with the Board, including, but not limited to:
 - Petition for *Inter Partes* Review of U.S. Patent 7,302,423 (423 Patent)
 - Exhibit 1001, U.S. Patent 7,302,423
 - Exhibit 1002, Prosecution History of U.S. Patent 7,302,423
 - Exhibit 1005, Declaration of Dr. Philip Greenspun
 - Exhibit 1006, U.S. Patent 5,701,453 (*Maloney*)
 - Exhibit 1007, U.S. Patent 7,168,039 (*Bertram*)
 - Exhibit 1008, U.S. Patent 6,300,947 (*Kanevsky*)
 - Exhibit 1009, John Walkenbach, Microsoft Excel 2000 Bible
 - Exhibit 1010, IBM Dictionary of Computing, Tenth Edition
 - Exhibit 1011, Declaration of Dr. Ingrid Hsieh-Yee
 - Exhibit 1012, Curriculum Vitae of Dr. Philip Greenspun

Exhibit 2001, Declaration of Dr. Wesley Chu,

Exhibit 2003, Declaration of Dr. Joseph L. De Bellis

Exhibit 2005, U.S. Patent 6,593,949 to Chew et al. (*Chew*)

Patent Owner's Preliminary Response

3. Patent Owner intends to elicit testimony related to applicability of the documents listed in paragraph 2, above as to the validity of the claims of the 423 Patent.

Respectfully submitted,

Dated: May 17, 2018

By: /John K. Harrop/
John K. Harrop
Reg. No. 41,817
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the date indicated below, a complete and entire copy of this submission was provided by email to Petitioner's counsel via email, as agreed to by Petitioner's Service Information in the October 6, 2017 Petition submission, by serving the email address of record as follows:

David M. O'Dell, Reg. No. 42,044 (David.odell.ipr@haynesboone.com)

Respectfully submitted,

Dated: May 17, 2018

By: /John K. Harrop/
John K. Harrop
Reg. 41,817
Lead Counsel for Patent Owner