

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FLEX LOGIX TECHNOLOGIES INC.,

Petitioner

V.

VENKAT KONDA,

Patent Owner

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Case IPR2020-00260

Patent 8,269,523 B2

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**PATENT OWNER VENKAT KONDA'S LIST OF FILED AND PROPOSED  
MOTIONS**

## **PATENT OWNER'S LIST OF FILED AND PROPOSED MOTIONS**

Pursuant to the Office Patent Trial and Appeal Board Consolidated Trial Practice Guide, November 2019, Patent Owner, Venkat Konda (the "Patent Owner" or "Venkat Konda"), submits the following list of filed and proposed motions it is currently contemplating filing. This list is provided without prejudice to Patent Owner's right to seek authorization to file additional motions or to not file the motions listed herein.

### **I. Request for Rehearing**

Pursuant to 37 C.F.R. § 42.71(c), Patent Owner Venkat Konda ("Patent Owner") respectfully requested the Patent Trial and Appeal Board ("Board") reconsider its decision granting institution for *inter partes* review of U.S. Patent No. 8,269,523 ("the '523 patent"), on August 10, 2020. (Paper 26).

### **II. Motion to Exclude Evidence**

Pursuant to 37 C.F.R. § 42.64, 37 C.F.R. § 42.11, and 37 C.F.R. § 42.51(b)(iii) Patent Owner filed motion to exclude from evidence exhibits Ex. 1002, Ex. 1003 and all the support presented in the Petition with respect to Ex. 1002 and Ex. 1003 served with the Petition, on August 10, 2020 (Paper 25).

Pursuant to 37 CFR § 42.64, Patent Owner reserves the right to file a motion to exclude evidence. While such a motion is automatically authorized, Patent Owner identifies such a motion to preserve its right to file the same.

### **III. Motion to Amend the Patent**

Pursuant to 37 CFR § 42.121(a), Patent Owner contemplates filing a motion to amend one or more claims of the '523 Patent, after conferring with the Board, regarding such a motion.

### **IV. Motion for Observations on Cross-Examination**

Pursuant to 37 CFR § 42.20(a), Patent Owner reserves the right to file a motion for observations on cross-examination. Patent Owner identifies such a motion to preserve its right to file the same.

### **V. Motion to Submit Supplemental Information**

Pursuant to 37 CFR § 42.123, Patent Owner contemplates filing a motion to submit Supplemental Information. Patent Owner identifies such a motion to preserve its right to file the same.

Patent Owner reserves the right to seek authorization, as required, to file additional motions not listed herein.

Date: August 17, 2020

Respectfully submitted,

/Venkat Konda/

Venkat Konda  
Pro Se Counsel  
6278 Grand Oak Way  
San Jose, CA 95135

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 17, 2020, the foregoing Patent Owner's List of Proposed Motions was served electronically via e-mail in their entirety on the following counsel of record for Petitioner by email to PH-FlexLogix-Konda-IPR@paulhastings.com

**Lead counsel:**

Naveen Modi (Reg. No. 46,224),

**Backup counsel:**

1. Joseph E. Palys (Reg. No. 46,508)
2. Paul M. Anderson (Reg. No. 39,896)
3. Quadeer A. Ahmed (Reg. No. 60,835).

**Service information:**

Paul Hastings LLP,  
875 15th St. N.W.,  
Washington, D.C., 20005,  
Tel.: 202.551.1700,  
Fax: 202.551.1705,  
Email: PH-FlexLogix-Konda-IPR@paulhastings.com.

/Venkat Konda/

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Venkat Konda  
Pro Se Counsel

Dated: August 17, 2020