

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TCL INDUSTRIES HOLDINGS CO., INC.,  
Petitioner,

v.

ATI TECHNOLOGIES ULC  
Patent Owner.

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Case No. IPR2024-00366  
U.S. Patent No. 8,760,454

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**PATENT OWNER'S RESPONSE  
TO PETITIONER'S MOTION FOR JOINDER**

On January 2, 2024, Petitioner filed a Motion for Joinder seeking joinder of the present proceeding with *Realtek Semiconductor Corp. v. ATI Technologies ULC*, Case No. IPR2023-00922. Patent Owner does not oppose joinder of these proceedings, under the conditions set forth in Petitioner's motion, in which Petitioner agrees to an "understudy" role, and the additional constraints that, as long as Realtek remains a party:

TCL will not rely on expert testimony beyond that submitted by Realtek;

TCL will not separately file or serve objections or discovery requests, will not receive separate cross examination or redirect time, and will not separately cross examine or redirect any witness;

TCL will not file substantive papers;

TCL agrees that Realtek will make all final decisions and will retain responsibility for oral argument (including telephone hearings and appeals);

and TCL will not seek or receive separate time and will not separately argue during oral argument, including telephone hearings and appeals.

Patent Owner believes these conditions are in keeping with Petitioner's representation that it will agree to an understudy role, and are conditions that the Board has found to be proper in these circumstances. *See, e.g., Keysight Technologies, Inc. v. Centripetal Networks, Inc.*, IPR2022-01199, Paper 13 at 62.

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Patent Owner attempted to secure TCL's agreement but did not receive a response.

Dated: February 2, 2024

/William A. Meunier/

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**CERTIFICATE OF SERVICE**

I certify that a copy of Patent Owner's Response to Petitioner's Motion for Joinder is being served by electronic mail on the following counsel of record:

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