

For the Patent Owner

Paper No. ___

Lead counsel: Richard Neifeld, Reg. No. 35,299
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Neifeld IP Law, PC

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KYOCERA INTERNATIONAL, INC.

Petitioner

v.

WISTARIA TRADING LTD.,

Patent Owner

Case IPR2017-01109

Patent 8,930,719

Patent Owner Motion for District Court-Type Claim Construction

1 Pursuant to 37 CFR 42.100(b), Patent Owner requests a district court-type
2 claim construction approach to be applied.

3 Pursuant to 37 CFR 42.100(b) and 42.20, Patent Owner certifies that the
4 involved patent will expire within 18 months from the filing date of the petition.

5 The petition was filed March 27, 2017.

6 Pursuant to 35 USC 154(a)(2), patent term is 20 years from the earliest date to
7 which the application claims a specific reference under 35 USC 120, 121, 365(c),
8 or 386(c). USP 8,930,719 is Exhibit 1001. Exhibit 1001 shows that the earliest
9 date to which USP 8,930,719 claims a specific reference is March 24, 1998.
10 Exhibit 1001 shows no patent term adjustment. This patent has a term that will
11 end 20 years from March 24, 1998, which is March 24, 2018.

12 March 24, 2018 is within 18 months of the petition filing date of March 27,
13 2017.

14 /RichardNeifeld/
15 Richard Neifeld, Registration No. 35,299
16 Lead counsel for Patent Owner
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1 42.6(e) CERTIFICATE OF SERVICE

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3 I certify that this document was served or simultaneously is being served on
4 each opposing party with the filing of this document. According to the Petition,
5 Petitioner consents to electronic service. I certify that the following exhibits being
6 filed along with this document, if any, have been or simultaneously are being
7 served on each opposing party: **N/A**

8

9 42.6(e)(4) (iii)(A) The date and manner of service:

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11 Manner of service: Email to npisano@foley.com and skaspar@foley.com

12

13 **Date of Service: 4/21/2017**

14

15 42.6(e)(4)(iii)(B) The name and address of every person served are:

16

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