Paper No.

# UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KINGSTON TECHNOLOGY COMPANY, INC. Petitioner,

v.

MEMORY TECHNOLOGIES, LLC Patent Owner.

Case IPR2019-00638 Patent 7,827,370

PATENT OWNER'S MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8

DOCKET

Patent Owner Memory Technologies, LLC ("Patent Owner") provides the following Mandatory Notices for this proceeding.

# I. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), the real party-in-interest is Memory Technologies, LLC, the assignee of record for U.S. Patent 7,827,370 ("the '370 patent").

## II. Related Matters

Patent Owner identifies the following matters that may be considered related pursuant to 37 C.F.R. 42.8(b)(2).

## A. Litigations

The '370 patent is at issue in the following pending litigation:

• Memory Technologies, LLC v. Kingston Technology Corp. et al., No. 8-18-cv-00171 (C.D. Cal. Jan. 31, 2018).

The '370 patent was at issue in the following terminated litigations:

- *Memory Technologies, LLC v. SanDisk LLC et al.*, No. 8-16-cv-02163 (C.D. Cal. Dec. 6, 2016) (voluntarily dismissed with prejudice); and
- Certain Flash Memory Devices and Components Thereof, No. 337-TA-1034 (ITC Dec. 5, 2016) (settled and terminated).

# **B.** Proceedings Before the USPTO

The '370 patent was at issue in the following terminated *inter partes* review:

• *SanDisk LLC v. Memory Technologies, LLC*, IPR2017-00868(P.T.A.B. Feb. 9, 2017) (settled before institution decision).

#### III. Lead and Back-Up Counsel and Service Information

Patent Owner designates the following lead and backup counsel for this

proceeding.

Lead Counsel	Back-Up Counsel
James D. Stein (Reg. No. 63,782)	Andrew Strickland (Reg. No. 67,755)
Lee & Hayes P.C.	Lee & Hayes P.C.
1175 Peachtree Street NE	1175 Peachtree Street NE
100 Colony Square, Suite 2000	100 Colony Square, Suite 2000
Atlanta, GA 30361	Atlanta, GA 30361
Phone: 404.736.1918	Phone: 404.736.1925
james.stein@leehayes.com	andrew.strickland@leehayes.com
	William B. Dyer III (Reg. No. 41,725) Lee & Hayes P.C.
	1175 Peachtree Street NE
	100 Colony Square, Suite 2000
	Atlanta, GA 30361
	Phone: 404.736.1857
	bill.dyer@leehayes.com

Please address all correspondence regarding this proceeding to lead and back-

up counsel. Patent Owner consents to electronic service by e-mail at MTL-370\_IPR638@leehayes.com.

Respectfully submitted,

Dated: March 8, 2019

/James D. Stein/ James D. Stein Reg. No. 63,782

# **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing PATENT OWNER'S MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8 was served electronically by email on March 8, 2019 on lead and back-up counsel of record for Kingston Technology Company, Inc., identified below, at kingston-370ipr@pillsburylaw.com.

#### Lead Counsel

RM

Robert C.F. Pérez PILLSBURY WINTHROP SHAW PITTMAN LLP 1650 Tysons Boulevard, 14th Floor McLean, VA 22101 Telephone: 703.770.7900 Facsimile: 703.770.7901

#### **Back-Up Counsel**

Christopher Kao Brock S. Weber PILLSBURY WINTHROP SHAW PITTMAN LLP Four Embarcadero Center, 22nd Floor San Francisco, CA 94111 Telephone: 415.983.1000 Facsimile: 415.983.1200

/James D. Stein/ James D. Stein Reg. No. 63,782