

By: Black Hills Media, LLC  
Reza Mollaaghababa  
Pepper Hamilton LLP  
125 High Street  
19<sup>th</sup> Floor, High Street Tower  
Boston, MA 02110  
(617) 204-5100 (telephone)  
(617) 204-5150 (facsimile)

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SAMSUNG ELECTRONICS CO. LTD.;  
SAMSUNG ELECTRONICS AMERICA, INC.; AND  
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC  
Petitioners

v.

BLACK HILLS MEDIA, LLC  
Patent Owner

---

Case No. IPR2014-00711  
Patent 8,230,099

---

**PATENT OWNER'S LIST OF PROPOSED MOTIONS**

Pursuant to the Decision of the Board to institute *inter partes* review (Paper 7, November 4, 2014) and the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756 (August 14, 2012), Patent Owner, Black Hills Media, LLC, does not currently anticipate filing any motions.

Dated: November 18, 2014

Respectfully submitted,

By: /Reza Mollaaghababa/  
Reza Mollaaghababa, Reg. No. 43,810  
Pepper Hamilton LLP  
125 High Street  
19<sup>th</sup> Floor, High Street Tower  
Boston, MA 02110  
(617) 204-5100 (telephone)  
(617) 204-5150 (facsimile)  
Attorney for Patent Owner

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2014, a true and accurate copy of this paper, PATENT OWNER'S LIST OF PROPOSED MOTIONS were served on the following counsel for Petitioner Samsung via email:

Andrea G. Reister (via e-mail only)

[areister@cov.com](mailto:areister@cov.com)

Covington & Burling LLP

1201 Pennsylvania Avenue, NW

Washington, DC 20004

Tel: (202) 662-5141

Fax: (202) 778-5141

Gregory S. Discher (via e-mail only)

[gdischer@cov.com](mailto:gdischer@cov.com)

Covington & Burling LLP

1201 Pennsylvania Avenue, NW

Washington, DC 20004

Tel: (202) 662-5485

Fax: (202) 778-5485

Dated: November 18, 2014 By: / Reza Mollaaghababa /  
Reza Mollaaghababa, Reg. No. 43,810  
Pepper Hamilton LLP  
125 High Street  
19<sup>th</sup> Floor, High Street Tower  
Boston, MA 02110  
(617) 204-5100 (telephone)  
(617) 204-5150 (facsimile)  
Attorney for Patent Owner