

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PANASONIC SYSTEM NETWORKS CO., LTD.
Petitioner

v.

6115187 CANADA INC.
Patent Owner

Case IPR 2014-01438
U.S. Patent No. 6,844,990

**RESPONSE TO NOTICE OF FILING DATE ACCORDED TO PETITION
AND
TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE**

Mail Stop PATENT BOARD, PTAB
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

**RESPONSE TO NOTICE OF FILING DATE ACCORDED TO PETITION
AND
TIME FOR FILING PATENT OWNER PRELIMINARY RESPONSE**

In response to the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response mailed September 11, 2014 (Paper No. 3), Petitioner submits concurrently herewith an amended petition addressing the noted defects (“**Amended Petition**”) and respectfully submits the following statement and comments:

Claim Charts

In the Amended Petition, as discussed with Cathy Underwood during a September 15, 2014 telephone call, Petitioner has revised the Claim Charts to remove reference to a POSA by deleting portions of the Claim Charts (at pages 28, 29, 42 and 45 of the originally filed petition). Accordingly, the defects in the Claim Charts have been corrected in the manner discussed during the telephone call, and no substantive changes have been made to the petition.

Authorization is hereby provided to charge any fee necessary for entry of this paper to Deposit Account No. 19-0089.

Dated: September 16, 2014

Respectfully submitted,

/Michael J. Fink/

/Arnold Turk/

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Attorneys for Petitioner,
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CERTIFICATE OF SERVICE

I hereby certify that the attached Response to Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response was served as of the below date by Federal Express on the Patent Owner at the correspondence address indicated for U.S. Patent No. 6,844,990:

Panitch Schwarze Belisario & Nadel LLP
One Commerce Square
2005 Market Street, Suite 2200
Philadelphia PA 19103.

Additionally, I hereby certify that the attached Response to Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response was served as of the below date by Federal Express on the following:

6115187 Canada Inc.
100, Alexis-Nihon, Suite 540
Saint Laurent, Quebec, Canada H4m 2p1

and

Pascale Nini
President and Chief Executive Officer
ImmerVision
2020 University St., Suite 2320,
Montreal, Quebec, Canada H3A 2A5.

Dated: September 16, 2014

/Arnold Turk/

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