

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CUB ELECPARTS INC.

Petitioner

v.

ORANGE ELECTRONIC CO., LTD.

Patent Owner

Patent No. 8,031,064 C3

IPR2024-00744

**PETITIONER’S UNOPPOSED MOTION FOR LEAVE TO FILE NEW
EXHIBITS TO ADD TRANSLATOR CERTIFICATIONS FOR THE
ORIGINAL EXHIBITS 1005 AND 1009**

LIST OF PROPOSED NEW EXHIBITS

Exhibit Number	Exhibit Content
1012	Certification of (original-04/24/24) Exhibit 1005
1013	Certification of (original-04/24/24) Exhibit 1009

LIST OF PROPOSED EXHIBITS TO BE EXPUNGED

Exhibit Number	Exhibit Filing Date	Exhibit Content
1005	August 21, 2024	JP 2006/15832 (Matsui) Certified Translation
1005	August 28, 2024	JP 2006/15832 and Certified Translation
1009	August 28, 2024	Taiwan Patent Office Invalidation Proceedings (Translation Certification)
1010	August 30, 2024	JP 2006/15832 and Certified Translation (Matsui)
1011	August 30, 2024	Taiwan Patent Office Invalidation Proceeding (translated) with Translation Certification

Petitioner respectfully requests entry of the translator certifications for (original-04/24/24) Exhibit 1005 (JP 2006/15832 and Translation (Matsui)) and (original- 04/04/24) Exhibit 1009 (Taiwan Patent Office Invalidation Proceedings). These translator certifications are proposed as Exhibit 1012 (Certification of Exhibit 1005) and Exhibit 1013 (Certification of Exhibit 1009). Patent Owner does not object to the entry of these translation certifications (email attached).

Petition also requests that the Exhibits 1010 and 1011 be expunged as well as the duplicate Exhibits 1005 and 1009 filed August 21, 2024 and August 28, 2024. The Table on page 2 provides the filing dates and contents of the Exhibits to be expunged. Petitioner apologizes for the confusion regarding this matter and for failing to submit the certifications with the initial April 4th filing.

Date: October 16, 2024

Respectfully submitted,

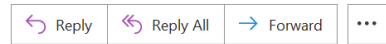
/Margaret Burke/
Margaret Burke
Reg. No. 34,474
Counsel for Petitioner

EMAIL EXCHANGE OF OCTOBER 16, 2024

RE: IPR2024-00744 Certification of Translation



Kiblawi, Fadi N. <fkiblawi@sughrue.com>
To: Margaret Burke (ILL); Rabena, John F.; Mandir, William H.
Cc: Sam Yip (ILL); General (ILL)



Wed 10/16/2024 2:38 PM

You replied to this message on 10/16/2024 2:41 PM.

Hi Margaret,
Thanks for the email. Patent Owner does not object to your submission of a certification statement for the machine translation.
Best regards,
Fadi

From: Margaret Burke (ILL) <mburke@ideaintellectual.com>
Sent: Wednesday, October 16, 2024 8:58 AM
To: Kiblawi, Fadi N. <fkiblawi@sughrue.com>; Rabena, John F. <[jraben@sughrue.com](mailto:jrabena@sughrue.com)>; Mandir, William H. <wmandir@sughrue.com>
Cc: Sam Yip (ILL) <syip@ideaintellectual.com>; General (ILL) <general@ideaintellectual.com>
Subject: IPR2024-00744 Certification of Translation

Dear Counsel,

In view of the recent ruling by the Board, would the Patent Owner consent to Petitioner's certification of the original machine translation? The remaining translations would be expunged from the record.

If the Patent Owner consents, I can present this solution without the need to further use administrative and legal resources on this simple issue.

Please let us know your position regarding this matter.

Margaret Burke

U.S. Patent Attorney | U.S. Attorney-at-law



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the date below, a copy of this Petitioner's Motion with copies of the Exhibits 1012 and 1013 were served on the Patent Owner at the following e-mail addresses:

Fadi Kiblawi fkiblawi@sughrue.com

John Rabena jrabena@sughrue.com

Soo Jin Hur shur@sughrue.com

Dated: October 16, 2024

Respectfully submitted,

/Margaret Burke/

Margaret Burke

Reg. No. 34,474

Counsel for Petitioner