

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADCOM CORPORATION

Petitioner

v.

TELEFONAKTIEBOLAGET L.M. ERICSSON

Patent Owner

Case IPR2013-00602

U.S. Patent Nos. 6,466,568

PATENT OWNER'S MOTION TO AMEND

U.S. PATENT NO. 6,466,568 UNDER 37 C.F.R. § 42.121

| EXHIBIT NO. | EXHIBIT DESCRIPTION |
|--------------|---|
| Exhibit 1001 | Raith, U.S. Patent No. 6,466,568 (“the ’568 Patent”) |
| Exhibit 1002 | Morley, U.S. Patent No. 5,488,610, entitled “Communication System” (“Morley”) |
| Exhibit 1004 | Sharma et al., U.S. Pat. No. 5,500,859, entitled “Voice and Data Transmission System” (“Sharma”) |
| Exhibit 1005 | Menand et al., U.S. Pat. No. 5,548,532, entitled “Apparatus and Method for Formulating an Interactive TV Signal” (“Menand”) |
| Exhibit 1006 | Adams et al., U.S. Patent No. 5,541,662, entitled “Content Programmer Control of Video and Data Display Using Associated Data” (“Adams”) |
| Exhibit 1007 | Padovani et al., U.S. Pat. No. 5,659,569, entitled “Data Burst Randomizer” (Padovani) |
| Exhibit 1008 | Mouly and Pautet, “The GSM System for Mobile Communications,” 1992 (selected pages) (“GSM”) |
| Exhibit 1017 | Zehavi and Viterbi, U.S. Pat. No. 5,581,575, entitled “Method and Aparatus for Transmission of Variable Rate Digital Data” (“Zehavi”) |
| Exhibit 2021 | Declaration of Robert Akl, D.Sc. in support of Motion to Amend |
| Exhibit 2022 | Application No. 08/725,643 (“the ’019 App.”), filed on Oct. 15, 1996 |
| Exhibit 2023 | Raychaudhuri & Wilson, entitled “ATM-Based Transport Architecture for Multiservices Wireless Personal Communication Networks,” IEEE Journal on Selected Areas |

| | |
|--------------|--|
| | in Communications, Vol. 12, No. 9, October 1992 ("Raychauduri") |
| Exhibit 2024 | Wagner et al., U.S. Pat. No. 5,761,292, entitled "Simultaneous Transfer of Control Information with Voice and Data Over a Public Switched Telephone Network Line" ("Wagner") |

I. INTRODUCTION

In the event that the challenged claims are found unpatentable, Patent Owner Telefonaktiebolaget L.M. Ericsson (“Ericsson”) hereby moves pursuant to the Board’s March 10, 2014 Order, Paper No. 27, and 37 C.F.R. § 42.121 to cancel claims 1-6 of U.S. Pat. No. 6,466,568 (“the ’568 Patent) and submit proposed substitute claims 8-13 in their place.

II. LISTING OF PROPOSED SUBSTITUTE CLAIMS

The following claim listing identifies the changes to the ’568 Patent so that the Board can identify the new limitations and deletions of limitations. *See* 37 C.F.R. § 42.121(b); *Nichia Corp. v. Emcore Corp.*, IPR2012-00005, Paper 68 at *50 (PTAB Feb. 11, 2014). Petitioner has used underlining to indicate text inserted in the corresponding original claim, as suggested by the Board. *Toyota Motor Corp. v. Am. Vehicular Sciences LLC*, IPR2013-00419, Paper 32 at *2 (PTAB March 7, 2014).

Proposed Claims

8. (Proposed Substitute for Original Claim 1) A communication station comprising: a processor for arranging information for transmission including providing at least one first field in which payload information is disposed and providing at least one second field, separate from said first field, which includes a service type identifier which identifies transmission characteristics of a service and

a type of payload information provided in said at least one first field; and a transmitter for transmitting information received from said processor including said at least one first field and said at least one second field.

9. (Proposed Substitute for Original Claim 2) The communication station of claim ~~18~~, wherein said processor is also for changing said type of payload information from a first type to a second type during a connection involving said communication station and adjusting a value of said service type identifier to correspond to the second type of information.

10. (Proposed Substitute for Original Claim 3) The communication station of claim ~~29~~, wherein said first type of information is one of video, voice and data and said second type of information is different one of video, voice and data.

11. (Proposed Substitute for Original Claim 4) The communication station of claim ~~18~~, wherein said information is multimedia information.

12. (Proposed Substitute for Original Claim 5) The communication station of claim ~~18~~, wherein said communication station is a base station.

13. (Proposed Substitute for Original Claim 6) The communication station of claim ~~18~~, wherein said communication station is a mobile station.

III. STATEMENT OF SUBSTITUTION CONTINGENCIES

Under 37 C.F.R. § 42.121(a)(3), this Motion includes one proposed substitute claim for each challenged claim to be replaced. Under 37 C.F.R. §

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.