

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BROADCOM CORPORATION

Petitioner

v.

WI-FI ONE, LLC

Patent Owner

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Case IPR2013-00602

U.S. Patent No. 6,466,568

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**PATENT OWNER'S REPLY TO PETITIONER'S OPPOSITION**

**TO MOTION TO AMEND U.S. PATENT NO. 6,466,568**

**Table of Exhibits for IPR2013-00602 for U.S. Pat. No. 6,466,568**

NO.	EXHIBIT DESCRIPTION
Exhibit 2001	PO's for Production
Exhibit 2002	Texas D-Link Complaint
Exhibit 2003	Texas D-Link Amended Complaint
Exhibit 2004	Texas D-Link Docket
Exhibit 2005	Form 10-Q SEC Filing
Exhibit 2006	Texas D-Link Intervention
Exhibit 2007	E-mail String 06-04-10
Exhibit 2008	E-mail String 12-09-13
Exhibit 2009	EC Complaint
Exhibit 2010	Letter from Ayers to Massa 11-15-13
Exhibit 2011	Letter from Massa to Ayers 11-25-13
Exhibit 2012	E-mail String 11-12-13
Exhibit 2013	E-mail String 11-13-13
Exhibit 2014	Texas D-Link Docket December 2013
Exhibit 2015	Texas D-Link Amended Disclosures
Exhibit 2016	Texas D-Link Order
Exhibit 2017	Motion of Broadcom for Leave to File Amicus Brief in Ericsson v. D-Link
Exhibit 2018	Final Judgment Pursuant to FRCP 54(b)
Exhibit 2019	Blacks Law Dictionary 9 <sup>th</sup> Ed. (definition of privity)
Exhibit 2020	Declaration of Robert Akl D.Sc. in support of Patent Owner's Response

NO.	EXHIBIT DESCRIPTION
Exhibit 2021	Declaration of Robert Akl D.Sc. in support of Patent Owner's Motion to Amend
Exhibit 2022	Application No. 8/725,643 filed on Oct. 15, 1996
Exhibit 2023	Raychaudhuri Article
Exhibit 2024	Wagner, et al. US Patent No. 5,761,292
Exhibit 2025	Deposition Transcript of Harry Bims, Ph.D. (October 17, 2014)
Exhibit 2026	Reply Declaration of Robert Akl, D.Sc., in Support of Patent Owner's Motion to Amend

**I. The proposed amendment “service type identifier which identifies transmission characteristics of a service and a type of payload information” is supported by the ’568 patent.**

“[T]he FOC can provide information regarding the type of service which the associated payload is currently supporting, the channel coding and/or interleaving associated therewith.” (’568 pat. at 9:29-32.) Even Broadcom admits that the ’568 patent “supports identifying channel coding in addition to the contents of the payload.” (Paper No. 47 at 5.) Both interleaving and channel coding are transmission characteristics. (Akl Dec. (Ex. 2026) ¶ 10; Akl Tr. (Ex. 1022) at 42:19-24; 50:15-18; 65:3-11; ’568 pat. at 9:64-10:3.) Undoubtedly, the FOC field can convey both information type and transmission characteristics and can be used for processing by knowing transmission characteristics such as the channel coding rate:

FOC may provide information relating to the same connection as the payload or data field in that time slot, e.g., a service type identifier which informs the mobile or base station of the type of information (e.g., voice, video or data) being conveyed in the payload. The information can be used by the receiving equipment to aid in the processing the information conveyed in the payload, e.g., by knowing the channel coding rate.

(’568 pat. at 3:11-22.) Because the information conveyed does not reflect channel coding rate (’568 pat. at 9:5-26; Akl Dec., ¶ 11), the service type identifier

identifies both transmission characteristics and a type of payload information just as in the proposed amendment.

## II. Morley does not anticipate claims 8-13 of the '568 patent.

Morley (Ex. 1002) discloses a header field that identifies the format of a multiplex frame to be transmitted. (Paper No. 38 at 10-11.) The format of the multiplex frame defines the amount, if any, of data and video frames included in the multiplex frame. (Akl Dec. ¶ 12.) Data in the multiplex frame is processed at 14400 bps, the rate defined by the modem data rate (Morley, at 10:32-33), while voice data frames in the multiplex frame are processed at 6800 bps, the rate of the voice decoder (Morley, at 10:23-25 and 10:33-34.) The Morley header does not determine, nor affect, the rate of processing the data (Bims Tr. (Ex. 2025) at 89:5-17) or the voice frames (*id.* at 88:14-89:4) of a multiplex frame. (Akl Dec. ¶ 12.)

Contrary to Broadcom's contention (Paper No. 47 at 7), Morley does not disclose separate voice and data channels as different services. Morley "aims to provide an improved communication system for combining at least two types of data and sending a composite signal over a single physical channel." (Morley 1:56-59.) The data and video of a multiplex frame are transmitted **together as a single service**, whose video and data processing rates are defined by the receiver, not the header in Morley. (Morley 4:38-44, 5:4-6, 39-51; Akl Dec. ¶ 13.) Morley discloses transmitting the voice and data as individual frames only as a multiplex

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