

DOCKET NO: 0111168.00239  
Filed on behalf of Broadcom Corp.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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BROADCOM CORP.  
Petitioner

v.

Patent Owner of  
U.S. Patent No. 6,424,625 to Peter Larsson *et. al.*

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,424,625  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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**I. MANDATORY NOTICES**

**A. Real Parties-in-Interest**

Broadcom Corporation (“Petitioner”) is the real party-in-interest and submits this Petition for *Inter Partes* Review (“Petition”) to review Claim 1 of U.S. Patent No. 6,424,625 (“the ‘625 patent”) (Ex. 1001).

**B. Related Matters**

In September 2010, Ericsson Inc. *et al.* (the “Patent Owner”) filed suit in the Eastern District of Texas against D-Link Systems, Inc., Netgear, Inc., Belkin International, Inc., Dell, Inc., Toshiba Corporation, Acer Inc., and Gateway Inc. (the “Defendants”) alleging infringement of several U.S. patents, including the ‘625 patent. (*See Ericsson Inc., et al. v. D-LINK Corp., et al.*, Civil Action No. 6:10-CV-473 (LED/KGF) (“Texas Litigation”)).<sup>1</sup> The Patent Owner’s infringement allegations were based in part on Defendants’ use of Petitioner’s Wi-Fi compliant products, such as the BCM4313 and BCM4321. Following an eight day trial on five patents, the jury found Claim 1 of the ‘625 patent infringed.

The Patent Owner did not allege that Petitioner infringed any patent asserted in the Texas Litigation, and Petitioner was not a party to the Texas Litigation. As a result, Petitioner has not had access to many documents in case, such as

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<sup>1</sup> On November 19, 2011, Intel Corporation filed a Motion to Intervene in the Texas Litigation, which the court granted on May 4, 2012.

depositions of inventors.

On September 20, 2013, Petitioner filed Petitions for *Inter Partes* Review for U.S. Patent Nos. 6,772,215 (IPR2013-00601) and 6,466,568 (IPR2013-00602). Because at least the IPR2013-00601 proceeding and this current Petition involve automatic repeat request (“ARQ”) technology, Petitioner respectfully requests consolidation of these actions.

**C. Counsel**

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**E. Certification of Grounds for Standing**

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

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