

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO. LTD.; SAMSUNG ELECTRONICS  
AMERICA, INC.; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC;  
AND SAMSUNG AUSTIN SEMICONDUCTOR, LLC;  
Petitioner

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP  
Patent Owner

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Case IPR2014-00519  
Patent 8,023,580

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**PETITIONER'S REPLY IN SUPPORT OF  
ITS PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 8,023,580**

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*Schrader-Bridgeport Int’l, Inc. v. Continental Auto. Sys., Inc.*, IPR2013-00014, Paper 32 (Mar. 12, 2014)..... 8

*Syntex (U.S.A.) LLC v. Apotex, Inc.*, 407 F.3d 1371 (Fed. Cir. 2005)..... 9

EXHIBIT LIST

<i>Exhibit No.</i>	<i>Description</i>
1301	U.S. Patent No. 8,023,580
1302	Complaint, <i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al</i> , No. 2:13-cv-00213 (E.D. Tex. 2013) (March 15, 2013)
1303	Proof of Service of Samsung Austin Semiconductor, LLC, <i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al</i> , No. 2:13-cv-00213 (E.D. Tex. 2013) (March 20, 2013)
1304	U.S. Patent No. 5,706,428
1305	Infringement Contentions, <i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al</i> , No. 2:13-cv-00213 (E.D. Tex. 2013) (July 25, 2013)
1306	“The IEEE Standard Dictionary of Electrical and Electronics Terms,” 6 <sup>th</sup> Ed., 1996, p. 661
1307	U.S. Application No. 12/543,910, as filed
1308	Office Action mailed on September 1, 2010 for U.S. Application No. 12/543,910
1309	Reply Pursuant to 37 CFR 1.111, dated March 1, 2011, for U.S. Application No. 12/543,910
1310	Reply Pursuant to 37 CFR 1.111, dated March 10, 2011, for U.S. Application No. 12/543,910
1311	Reply Pursuant to 37 CFR 1.111(a)(2), dated May 11, 2011, for U.S. Application No. 12/543,910
1312	Notice of Allowance and Issue Fee(s) Due, dated July 22, 2011
1313	Amendment After Allowance Pursuant to 37 CFR § 1.312, dated July 26, 2011, for U.S. Application No. 12/543,910
1314	U.S. Patent No. 6,614,838
1315	Office Action mailed June 28, 2001 for U.S. Application No. 09/205,205

<i>Exhibit No.</i>	<i>Description</i>
1316	First Amendment and Response, dated October 5, 2001, in U.S. Application No. 09/205,205
1317	Declaration of Jon Mears; Exhibit A thereto (Upender, “Communication Protocols for Embedded Systems,” <i>Embedded Systems Programming</i> , Vol. 7, Issue 11, November 1994.
1318	Declaration of Dr. David Goodman, including Curriculum Vitae
1319	Deposition Transcript of Philip J. Koopman, Jr., Ph.D., dated January 13, 2015
1320	Data Network Evaluation Criteria Handbook, DOT/FAA/AR-09/24 Final Report, dated June 2009
1321	U.S. Patent No. 5,450,404
1322	U.S. Patent No. 5,436,901
1323	U.S. Patent No. 5,535,212
1324	<i>Order Granting Motion for Fees and Costs, Requesting Submission of Materials for in camera Review and Granting Motion to Strike</i> , Innovative Biometric Tech., LLC v Toshiba Am. Info. Sys., No. 9:09-81046-CIV-KLR, dated August 29, 2012.
1325	<i>Order Granting Toshiba America Information Systems, Inc.’s Motion to Unseal Court Orders (DE 340, 357, and 372)</i> , Innovative Biometric Tech., LLC v Lenovo (U.S.), Inc., No. 9:09-81046-CIV-KLR, dated June 27, 2013.

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