

Samsung Petitioners' Presentation

Inter Partes Review of Patent Owner's U.S. Patent No. 8,023,580

April 24, 2015

IPR2014-00518, 00519

Patent Trial and Appeal Board

United States Patent and Trademark Office

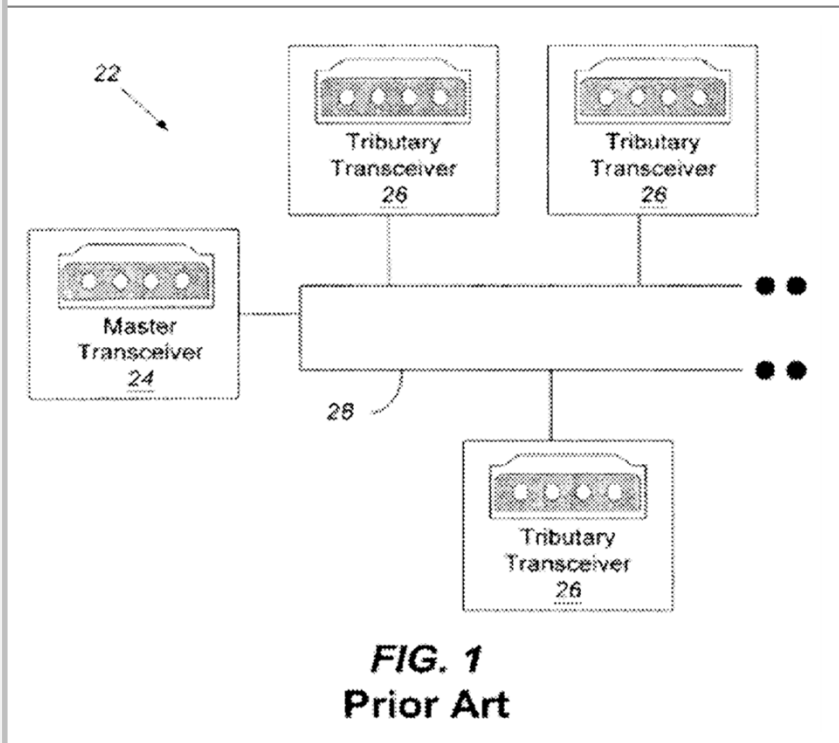
Samsung Exhibit 1326
Samsung v. Rembrandt
IPR2014-00519
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Abbreviations

Abbreviation	Description
P1	IPR2014-00518, Paper 4, Amended Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,023,580
P2	IPR2014-00519, Paper 4, Amended Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,023,580
Opp1	IPR2014-00518, Paper 25, Patent Owner's Opposition
Opp2	IPR2014-00519, Paper 25, Patent Owner's Opposition
Reply1	IPR2014-00518, Paper 32, Petitioners' Reply to Patent Owner's Opposition
Reply2	IPR2014-00519, Paper 34, Petitioners' Reply to Patent Owner's Opposition

Technology At Issue

Problems In Prior Art, As Identified In '580 Patent:



“[C]ommunication between modems is generally unsuccessful unless a common modulation method is used.”

* * *

“If one or more of the trib modems are not compatible with the modulation method used by the master, those tribs will be unable to receive communications from the master.”

Ex. 1201/1301 ('580 Patent) at Fig. 1, 1:45-47; 1:58-61; P1 at 3, 11; P2 at 3.

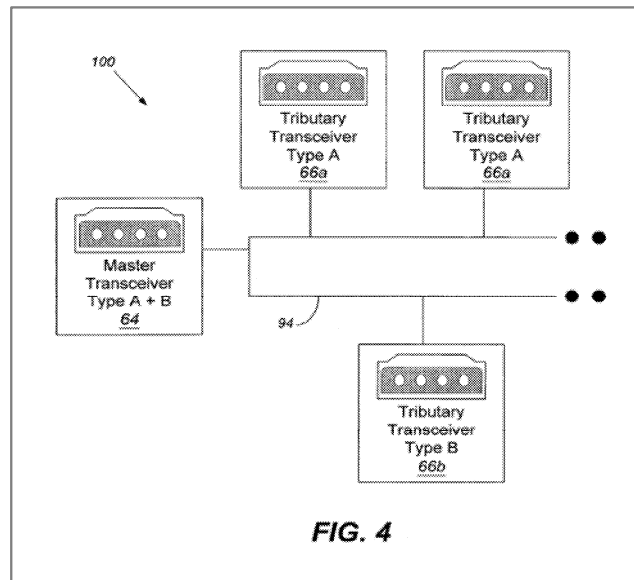
Technology At Issue

Purported Invention:

“[W]hat is sought, and **what is not believed to be provided by the prior art**, is a system and method of communication in which **multiple modulation methods are used to facilitate communication** among a plurality of modems in a network, **which have heretofore been incompatible.**”

“The present invention relates generally to the fields of data communications and modulator/demodulators (modems), and, more particularly, to a data communications system in which a **plurality of modulation methods are used to facilitate communication among a plurality of modem types.**”

Ex. 1201/1301 ('580 Patent) at 2:16-20; 1:19-23; P1 at 3-4; P2 at 3-4.



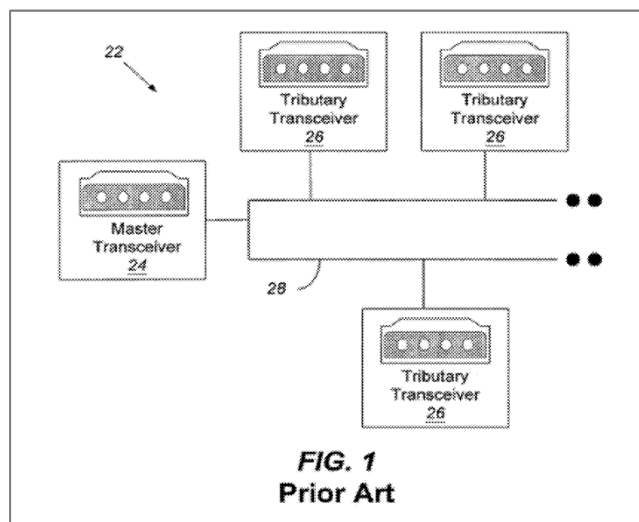
Ex. 1201/1301 ('580 Patent), Fig. 4.

All Claims At Issue Are Unpatentable Under 35 USC § 103 As Obvious Over APA And Boer

Admitted Prior Art (“APA”) (Ex. 1201/1301)

“FIG. 1 is a block diagram of a **prior art multipoint communication system** including a **master transceiver** and a plurality of **tributary transceivers**;

Ex. 1201/1301 ('580 Patent) at 3:6-8, Fig. 1; P1 at 6, 14; P2 at 6, 37.



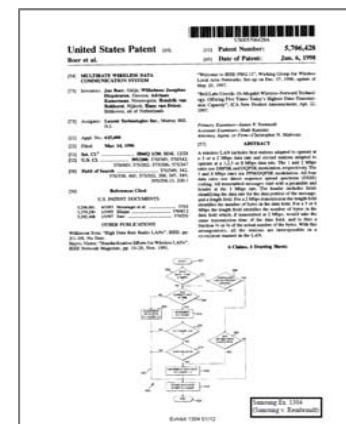
- Patent Owner’s response does not dispute that master-slave systems were known in the art.

Reply1 at 6; Reply2 at 6.

U.S. Patent No. 5,706,428 (“Boer”) (Ex. 1204/1304)

“A wireless LAN includes first stations adapted to operate at a 1 or a 2 Mbps data rate and second stations adapted to operate at a 1,2,5 or 8 Mbps data rate. **The 1 and 2 Mbps rates use DBPSK and DQPSK modulation, respectively. The 5 and 8 Mbps rates use PPM/DQPSK modulation.**”

Ex. 1204/1304 (Boer) at Abstract; P1 at 16, 20; P2 at 12, 15.



- Boer discloses all other limitations of the instituted patent claims.

P1 Claim Charts; P2 Claim Charts.

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