#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE CORPORATION AND ZTE (USA) INC., and MICROSOFT CORPORATION, Petitioners

v.

IPR LICENSING, INC., Patent Owner.

Case IPR2014-00525<sup>1</sup> U.S. Patent No.: 8,380,244

Before SALLY C. MEDLEY, MIRIAM L. QUINN, and BEVERLY M. BUNTING, Administrative Patent Judges.

#### PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

<sup>1</sup> Case IPR2015-00074 has been joined with this proceeding.

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#### **TABLE OF AUTHORITIES**

#### Cases

Ariad Pharms., Inc. v. Eli Lilly & Co., 598 F.3d 1336 (Fed. Cir. 2010)
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Rules
37 C.F.R. § 42.121
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#### **REFERENCED EXHIBITS<sup>2</sup>**

Exhibit	Description
1001	U.S. Patent No. 8,380,244 ("244 Patent")
1002	Declaration of Dr. Harry Bims in Support of the Petition
	for Inter Partes Review of U.S. Patent No. 8,380,244
	("Bims Decl.")
1003	U.S. Patent No. 6,243,581 to Jawanda ("Jawanda")
1005.03	GSM 03.60 v. 6.1.1 R97
1009	Joint Claim Construction Brief (Public), InterDigital
	Commc'ns, Inc. v. Huawei Techs. Co., No. 1:13-cv-0008,
	No. 1:13-cv-0009, No. 1:13-cv-00010 (D. Del. filed Nov.
	21, 2013)
1025	Deposition of Dr. Wayne E. Stark (dated March 24, 2015)
	("Stark Tr.")
2005	Declaration of Dr. Wayne E. Stark (dated Jan. 6, 2015)
	("Stark Decl.")
2006	Deposition Transcript of Dr. Harry Bims (dated Dec. 19,
	2014) ( <b>"Bims Tr."</b> )
2013	U.S. Patent No. 7,616,970 ("970 parent patent")
2022	Supplemental Markman Opinion and Claim Construction
	Order, InterDigital Commc'ns, Inc. v. Nokia Corp., No.
	1:13-cv-0010 (D. Del. Mar. 6, 2015 and Mar. 13, 2015)
2023	InterDigital Commc'ns, Inc. v. U.S. Int'l Trade Comm'n,
	No. 2014-1176 (Fed. Cir. Feb. 18, 2015)

<sup>2</sup> Petitioners' are filing and serving concurrently with this paper Petitioners' Updated Exhibit List in its entirety. 37 C.F.R. § 42.63(e).

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#### Petitioners' Reply in IPR2014-00525 Attorney Docket No. 14569.00009 STATEMENT OF MATERIAL FACTS IN DISPUTE

Patent Owner did not submit a statement of material facts in its Patent

Owner Response. Accordingly, Petitioners' Reply need not provide a response

pursuant to 37 C.F.R. § 42.23(a), and no facts are admitted.

#### ABBREVIATIONS

Pet.ZTE's Second Corrected Petition for Inter Partes ReviewPrelim. Resp.Patent Owner's Preliminary ResponsePO Resp.Patent Owner's Response

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