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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WATERMARKET, INC. D/B/A LOCATION LABS

Petitioner

v.

LOCATIONNET SYSTEMS, LTD.

Patent Owner

Case No. IPR2014-00199
U.S. Patent 6,771,970

**PATENT OWNER'S PRELIMINARY RESPONSE TO LOCATION LABS'
PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,771,970**

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Exhibit Description	Exhibit #
Pro Hac Vice Motion of Mark Hogge entering an appearance on behalf of T-Mobile USA Inc. in 12-cv-1702 D.I. 18 (Federal District of Delaware)	2001
Pro Hac Vice Motion of Mark Hogge entering an appearance on behalf of Sprint Nextel Corp. in 12-cv-1703 D.I. 23 (Federal District of Delaware)	2002
A page of Location Lab's website indicating partnering with T-Mobile and Spring to provide subscription-based, mobile device management and location services	2003

**PATENT OWNER PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. § 42.107**

Pursuant to 37 C.F.R. § 42.107, the Patent Owner, LocationNet Systems, Ltd. (“LocationNet”) hereby submits the following Preliminary Response to the Petition seeking *inter partes* review of U.S. Patent No. 6,771,970 (the ‘970 Patent). This filing is timely under 35 U.S.C. § 313 and 37 C.F.R. § 42.107, as it is being filed within three months of the mailing date of the Notice of Filing Date Accorded to Petition (Paper 3), mailed December 17, 2013.

I. INTRODUCTION

LocationNet is the owner of the entire interest in the ‘970 patent, and thus is a real party-in-interest. Callwave Communications, LLC (“Callwave”) is an exclusive licensee of the ‘970 patent and is also a real party-in-interest.

A trial should not be instituted in this matter because Petitioner has failed to identify each of the real parties in interest under 37 C.F.R. § 42.8(b)(1).

Further, the anticipation and obviousness grounds raised by the Petitioner against the challenged claims are horizontally and vertically redundant. Should a trial be instituted based on certain grounds, other redundant grounds should be dismissed.

The patent owner elects not to provide substantive responses to the grounds raised by the Petitioner against the challenged claims at this time. This

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