IN THE UNITED STATES PATENT AND TRADEMARK OFFICE **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In re Patent of: Paul D. Arling and	
Patrick H. Hayes	Universal Rem
Patent No.: 8,243,207	
Filed: September 29, 2009	Universal Elec
Issued: August 14, 2012	Case No. IPR2
Assignee: Universal Electronics Inc.	Trial Paralegal
Title: SYSTEM AND METHOD FOR ACTIVITY BASED CONFIGURATION OF AN ENTERTAINMENT SYSTEM	

note Control, Inc.

v.

ctronics, Inc.

2014-01146

l: Amy Kattula

Mail Stop PATENT BOARD Patent Trial and Appeal Board United States Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

Δ

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

Certificate of Filing: I hereby certify that this correspondence is being electronically filed with the USPTO on this 24th day of June, 2015

By: /Jeannie Ngai/ Jeannie Ngai

TABLE OF CONTENTS

I.	INT	RODUCTION1
II.	CLAIM CONSTRUCTION	
	A.	Broadest Reasonable Interpretation1
	B.	Claim Terms For Construction2
		1. "Device" v. "Appliance"2
		2. "activation key"2
		3. "configuration of the entertainment device"
III.	Clai	ms 13-15 of the '207 Patent Are Anticipated By Dubil8
	А.	Claim 138
		1. Dubil discloses the "configuration of the entertainment device"8
		2. Dubil discloses associating "a command value corresponding to an activity key of a controlling device with a configuration of the entertainment"
		3. Dubil discloses "causing the entertainment device to access and use the configuration associated with the command value corresponding to the activity key of the controlling device in response to the entertainment device receiving from the controlling device a signal which includes the command value corresponding to the activity key of the controlling device."11
		4. Dubil discloses "downloading the configuration of the entertainment device into the entertainment device from a computing device in communication with the entertainment device"
	B.	Claim 1413
		1. Dubil discloses a "configuration of the entertainment device"13
		2. Dubil discloses "receiving at the entertainment device from a controlling device a configuration request signal, wherein the configuration request signal includes a command value corresponding to an activity key of a controlling device"14

{01751471.1}

DOCKET

- ii -

		3. Du	ibil discloses "causing the command value corresponding to t	the
			activity key of the controlling device included in the	
			configuration request signal to be automatically associated w	vith
			a configuration of the entertainment device."	15
	C.	Claim	15	16
III.	Con	clusion.		17

{01751471.1}

- iii -

TABLE OF AUTHORITIES

Cases	Page
Constant v. Advanced Micro-Devices, Inc., 848 F.2d 1560 (Fed Cir 1988)	2
<i>Philips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005)	2, 7
Regulations	
37 C.F.R. §42.100(b)	1
M.P.E.P. 2111.01	1, 6

 $\{01751471.1\}$

EXHIBIT LIST

1001*	U.S. Patent No. 8,243,207 (filed September 29, 2009) (issued August 14, 2012) to Paul D. Arling and Patrick H. Hayes.
1002*	Prosecution history of U.S. Patent Application Serial No. 12/569,161, which matured into the '207 patent.
1003*	Declaration of Jim Geier, In Support of the Petition for <i>Inter</i> <i>Partes</i> Review of U.S. patent No. 8,243,207
1004*	First Amended Complaint for patent Infringement in Universal Electronics Inc. v. Universal Remote Control, Inc., Civil Action No. SACV 13-00984, dated July 22, 2013
1005*	U.S. Patent Publication No. 2003/0120831 (filed December 20, 2001) (published June 26, 2003) to Thomas Dubil et al.
1006*	"IntelliControl Reference Manual" Version. 8.1, April 2002 by Niles Audio Corporation.
1007*	U.S. Patent No. 4,527,204 (filed February 14, 1983) (issued July 2, 1985) to Daisuke Kozakai.
1008-1045	INTENTIONALLY SKIPPED
1046	Amended Notice of Deposition Of Alex Cook in Case No. IPR2014-1146 (Paper 19)
1047	Decision Institution of <i>Inter Partes</i> Review in Case No IPR2014- 1146 (Paper 9)(January 9, 2015)
1048-1053	INTENTIONALLY SKIPPED
1054	Transcript of June 17, 2015 Deposition of Alex Cook
1055	Reply Declaration of James T. Geier
* Previously fil	led.

{01751471.1}

DOCKET

- V -

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.