

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC.,
Patent Owner.

Case: IPR2015-00369
U.S. Patent No. 6,128,290

**PATENT OWNER DSS TECHNOLOGY, INC.'S
RESPONSE TO PETITION**

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| A. Claims 1-4 are not rendered obvious by Natarajan in view of Neve | 15 |
| 1. Natarajan does not teach or suggest that the server transmitter is energized in low duty cycle RF bursts | 15 |
| a. Natarajan is silent with respect to operation of server transmitter during outbound data traffic periods | 15 |
| b. The HDLC packet structure disclosed in Natarajan is inconsistent with a server transmitter being energized in low duty cycle RF bursts | 20 |
| c. Natarajan’s disclosure of “bursty traffic” during the contention period does not teach or suggest that the server transmitter is energized in RF bursts | 22 |
| d. Petitioner failed to meet its burden of establishing that Natarajan in view of Neve teaches or suggests that the server transmitter is energized in low duty cycle RF bursts | 24 |

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| 2. | Combining Natarajan with Neve does not cure deficiencies of Natarajan and further suggests that the combination of these references does not teach or suggest that server transmitter is energized in low duty cycle RF bursts | 27 |
| a. | Petitioner’s expert distinguished Neve from transmissions involving RF bursts | 27 |
| b. | Neve does not teach or suggest that server transmitter is energized in low duty cycle RF bursts | 30 |
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