UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AT&T MOBILITY LLC CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS Petitioners

V.

SOLOCRON MEDIA, LLC Patent Owner

Case IPR2015-00388 Patent 8,594,651 B2

PATENT OWNER SOLOCRON MEDIA, LLC'S PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW OF UNITED STATES PATENT NO. 8,594,651 PURSUANT TO 35 U.S.C. § 313, 37 C.F.R. § 42.107



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	TERES Lega 1. 2. 3. Veri 1. 2. 3.	 Legal Background. Parent Corporations That Control Their Subsidiaries Are Routinely Considered Real Parties-In-Interest. Parent Corporations That Blur Corporate Lines With Their Subsidiaries Are Routinely Considered Real Parties-In-Interest. Parent Corporations That Have An Aligned Interest In Invalidating A Patent, Take Unified Actions In Litigation, And/Or Share Common Counsel Are Routinely Considered Real Parties-In-Interest. Verizon Is A Real Party-In-Interest. Verizon Fully Controls Verizon Wireless. The Verizon Entities Blur Their Corporate Lines. Verizon And Verizon Wireless Have Identical Interests In Invalidating The Patents And Have Worked In Concert Through Shared Counsel To Accomplish That Goal. AT&T And AT&T Services Are Real Parties-In-Interest. AT&T Fully Controls Its Subsidiary AT&T Mobility. The AT&T Entities Blur Their Corporate Lines. AT&T And AT&T Mobility Have Identical Interests In Invalidating The Patents And Have Worked In Concert



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