UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., AND APPLE INC.,

Petitioner

v.

IXI IP, LLC

Patent Owner

Case IPR2015-01444 Patent 7,039,033

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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Patent		
B.	IXI's contention that the LUS must be on a master device is unsupported	
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C2.	Marchand describes the LUS on its GMP 3310	
C3.	Marchand's FIG. 4 does not limit the location of the LUS to laptop 3111	
III. Marchand discloses a network address translator software component that is		

IV.]	7. Marchand, Nurmann, and Vilander disclose "a first Internet Protocol ('IP')	
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V.]	Marchand discloses a thin terminal	
VI. Marchand, Nurmann, Vilander, and RFC 2543 disclose a DNS Software		
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VII.	Marchand, Nurmann, Vilander, and Larsson disclose the claimed security	
	software component and virtual private network	
VIII.	Marchand, Nurmann, Vilander, and JINI Spec. disclose a plug and play	
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EXHIBIT LIST

EXHIBIT-1001	U.S. Patent No. 7,039,033 to Haller et al. ("'033 Patent")
EXHIBIT-1002	S. M. Bellovin et al., Network Firewalls, Network Firewalls, IEEE Communications Magazine, Vol. 32, Issue 9, pp. 50-57, 1999 ("Bellovin")
EXHIBIT-1003	Declaration of Dr. Sayfe Kiaei
EXHIBIT-1004	Curriculum Vitae of Dr. Sayfe Kiaei
EXHIBIT-1005	PCT. Publication No. WO 01/76154 A2 to Marchand ("Marchand PCT")
EXHIBIT-1006	U.S. Patent Application No. 09/541,529 to Marchand ("Marchand Priority")
EXHIBIT-1007	Handley et al., <i>Request For Comments 2543 SIP: Session Initiation Protocol</i> , The Internet Society, March, 1999 ("RFC 2543")
EXHIBIT-1008	U.S. Patent No. 6,836,474 to Larsson ("Larsson")
EXHIBIT-1009	K. Arnold et al., <i>The JINITM Specification</i> , Addison-Wesley, June 1, 1999 ("JINI Spec.")
EXHIBIT-1010	U.S. Patent No. 6,560,642 to Nurmann ("Nurmann")
EXHIBIT-1011	U.S. Patent No. 6,771,635 to Vilander ("Vilander")
EXHIBIT-1012	Claim Chart from IXI's Infringement Contentions of U.S. Patent No. 7,039,033 in 14-cv-4428 (April 9, 2015)
EXHIBIT-1013	Claim Chart from IXI's Infringement Contentions of U.S. Patent No. 7,039,033 in 14-cv-4355 (March 27, 2015)
EXHIBIT-1014	R. Droms, <i>Request for Comments 2131 Dynamic Host Configuration Protocol</i> , The Internet Society, March, 1997 ("RFC 2131")

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EXHIBIT-1015	U.S. Patent No. 6,622,017 to Hoffman ("Hoffman")
EXHIBIT-1016	J. Newmarch, A Programmer's Guide to Jini Technology, Apress, 2000 ("Newmarch")
EXHIBIT-1017	U.S. Patent No. 5,963,908 to Chadha ("Chadha")
EXHIBIT-1018	Deposition Transcript of Dr. Mandayam, IPR2015-01443, May 18, 2016
EXHIBIT-1019	Deposition Transcript of Dr. Mandayam, IPR2015-01444, May 19, 2016

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