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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 No. IPR2015-01444
Patent 7,039,033

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

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2. Marchand, alone or in combination with Nurmann and Vilander, fails to disclose the "service repository software component" as recited in independent claim 1 24

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2. The Petition fails to demonstrate any motivation to modify Marchand in view of Nurmann, Vilander, and Larsson to arrive at the claimed invention 42
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1. Marchand, alone or in combination with Nurmann Vilander, and JINI Spec, fails to disclose that the processor operative with the software component to "enumerate a list of services available from the handheld device and the terminal" and "search the list of services"

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as recited in independent claim 34 and similarly in independent claim 42 43

2. Marchand, alone or in combination with Nurmann Vilander, and JINI Spec, fails to disclose "wherein the software component includes a plug and play software component to identify the terminal in a short distance wireless network and obtain the application software component for the terminal" as recited in claims 12 and 40 45

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