

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner,

v.

TRACBEAM, LLC,  
Patent Owner.

Patent No. 7,525,484

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*Inter Partes* Review No. \_\_\_\_\_

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**PETITION FOR *INTER PARTES* REVIEW**

**UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ.***

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**Exhibit List for Inter Partes Review of U.S. Patent No. 7,525,484**

Exhibit Description	Exhibit #
<i>U.S. Patent No. 7,525,484 to Dupray et al. [referenced as “<b>the ’484 patent</b>”]</i>	1001
<i>Declaration of Kevin S. Judge [referenced as “<b>Judge Decl.</b>”] (includes Mr. Judge’s CV as Appendix A thereto)</i>	1002
<i>PCT Application No. PCT/US97/15892, published on March 12, 1998 as PCT Publication No. WO 98/10307 [referenced as “<b>PCT ’307</b>”]</i>	1003
<i>February 20, 2002 “Preliminary Amendment” in prosecution of the ’484 patent</i> <i>*Note: this is a partial copy (missing pages 91-133) that is attached to a March 22, 2006 “Response to Office Action Dated February 8, 2006” (and this exhibit contains these documents as they appear in the publicly available file history for the ’484 patent on PAIR, which is incomplete in many regards)</i>	1004
<i>Rappaport et al., “Position Location Using Wireless Communications on Highways of the Future,” IEEE Communications Magazine, pp. 33-41 (Oct. 1996) [referenced as “<b>Rappaport</b>”]</i>	1005
<i>Krizman et al., “Wireless Position Location: Fundamentals, Implementation Strategies, and Sources of Error,” IEEE Vehicular Technology Conf., Phoenix, AZ (May 5-7, 1997) [referenced as “<b>Krizman</b>”]</i>	1006
<i>U.S. Patent No. 5,604,765 to Bruno et al. [referenced as “<b>Bruno</b>”]</i>	1007 (prior art)
<i>U.S. Patent No. 5,936,572 to Loomis et al. [referenced as “<b>Loomis</b>”]</i>	1008 (prior art)
<i>U.S. Patent No. 5,602,903 to LeBlanc et al. [referenced as “<b>LeBlanc</b>”]</i>	1009 (prior art)

<i>U.S. Patent No. 4,903,212 to Yokouchi et al. [referenced as “Yokouchi”]</i>	<i>1010 (prior art)</i>
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Petitioner Apple Inc. (“Petitioner”) respectfully petitions for *inter partes* review of claims 25-27, 31, 36-40, 45, 49-51, 56-57, 60-61, 63 and 72 of U.S. Patent No. 7,525,484 (“the ’484 patent” (Ex. 1001)) in accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.*

## I. NOTICES AND STATEMENTS

Pursuant to 37 C.F.R. § 42.8(b)(1), Apple Inc. is the real party-in-interest.

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner identifies the following related matters in which the ’484 patent is asserted: *TracBeam, LLC v. Apple Inc.*, Case No. 6:14-cv-680 (E.D. Tex.) (“the *Apple* case”) and *TracBeam, LLC v. T-Mobile US, Inc., et al.*, Case No. 6:14-cv-678 (E.D. Tex.), both pending. The ’484 patent was previously asserted in *TracBeam, LLC v. AT&T, Inc. et al.*, Case No. 6:11-cv-96 (E.D. Tex.) and *TracBeam, LLC v. Google, Inc.*, Case No. 6:13-cv-93 (E.D. Tex.), both dismissed. Petitioner is concurrently filing an additional petition for *inter partes* review of the ’484 patent on separate grounds, as well as petitions on the other patents asserted in the *Apple* case—U.S. Patent Nos. 7,764,231 (“the ’231 patent”), 7,298,327 (“the ’327 patent”), and 8,032,153 (“the ’153 patent”). On August 11, 2015, T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson filed three petitions for *inter partes* review of the ’484 patent that have been assigned case numbers IPR2015-01708, -01709, and -01711.

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