

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc.,  
Ericsson Inc., and Telefonaktiebolaget LM Ericsson  
*Petitioners,*

v.

TracBeam, LLC,  
*Patent Owner.*

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Case No. IPR2015-01708  
U.S. Patent No. 7,525,484

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**PETITIONERS' REPLY  
TO PATENT OWNER'S RESPONSE TO PETITION**

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**EXHIBITS<sup>1</sup>**

<b>Number</b>	<b>Description</b>
1001	U.S. Patent No. 7,764,231 (the “231 Patent”)
1002	U.S. Patent No. 7,525,484 (the “484 Patent”)
1003	U.S. Patent No. 8,032,153 (the “153 Patent”)
1004	U.S. Patent No. 7,298,327 (the “327 Patent”)
1005	<i>Curriculum Vitae</i> of Dr. William Michalson
1006	Expert Declaration of Dr. William Michalson
1007	U.S. Patent No. 5,724,660 to Kauser (“ <i>Kauser</i> ”)
1008	U.S. Patent No. 5,936,572 to Loomis (“ <i>Loomis</i> ”)
1009	U.S. Patent No. 6,748,226 to Wortham (“ <i>Wortham</i> ”)
1010	International PCT Application No. PCT/US93/12179 to Schuchman (“ <i>Schuchman</i> ”)
1011	U.S. Patent No. 5,327,144 to Stilp (“ <i>Stilp</i> ”)
1012	FAA Advisory Circular 20-101C, <i>Airworthiness Approval of Omega/VLF Navigation Systems For Use in the U.S. National Airspace System (NAS) and Alaska</i> (Sep. 12, 1988)

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<sup>1</sup> Petitioners' Reply uses the same exhibits provided in the Petition. No new exhibits have been added. Petitioners include this Exhibit List for the Board's convenience.

1013	FAA Advisory Circular 20-130A, <i>Airworthiness Approval of Navigation or Flight Management Systems Integrating Multiple Navigation Sensors</i> (Jun. 14, 1995)
1014	<i>FCC Notice of Proposed Rulemaking for Locating Wireless 911 Callers</i> (Released Oct. 19, 1994)
1015	TR45 Joint Experts Meeting (JEM) for Emergency Services (Aug. 18, 1994)
1016	C.J. Driscoll & Associates, <i>Survey of Location Technologies to Support Mobile 9-1-1</i> , July 1994 ("Driscoll")
1017	Claim Construction Order (MetroPCS and TCS lawsuits)
1018	Supplemental Claim Construction Order
1019	Complaint against MetroPCS
1020	Complaint filed by TCS
1021	Dismissal Request (MetroPCS and TCS lawsuits)
1022	Dismissal Order (MetroPCS and TCS lawsuits)
1023	MetroPCS Corporate Disclosure Statement (MetroPCS lawsuit)
1024	American Heritage Dictionary, Houghton Mifflin Company (4th ed. 2000) (definition of "locus")

## I. INTRODUCTION

Petitioners T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson (collectively "Petitioners") submit this Reply to Patent Owner TracBeam's ("Patent Owner" or "TracBeam") Response to the Petition for *inter partes* review ("IPR") of claim 1 of U.S. Patent No. 7,525,484 ("the '484 Patent") to Dupray et al., titled "Gateway and Hybrid Solutions for Wireless Location." (See Ex. 1002.)

Patent Owner's Response reiterates the same deficient arguments that the Board already rejected when it instituted an IPR of claim 1. (See Decision to Institute *Inter Partes* Review, Paper No. 10 (hereinafter "Decision") at 14-17.) Patent Owner has added no new evidence to support its position, either in the form of an expert declaration or cross-examination testimony of Petitioners' expert, Dr. Michalson. With the exception of the District Court's claim construction ruling (Ex. 2004), the record that the PTAB relied on when instituting this *inter partes* review, is the same record now before the Board. (See Decision at 23 ("On the current record, we are persuaded that Petitioner has established likelihood that it would prevail with respect to claim 1 as obvious over Loomis and Wortham."))

Nevertheless, this Reply addresses each of Patent Owner's arguments in its Response, i.e., (1) Patent Owner disagrees with the District Court's construction of the "location estimating source" term; (2) Petitioners allegedly fail to identify any

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