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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

T-MOBILE US, INC., T-MOBILE USA, INC., TELECOMMUNICATION SYSTEMS, INC., ERICSSON INC., and TELEFONAKTIEBOLAGET LM ERICSSON Petitioners,

v.

TRACBEAM, LLC, Patent Owner

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

PATENT OWNER'S PRELIMINARY RESPONSE TO THE PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,525,484 UNDER 35 U.S.C. § 313 PURSUANT TO 37 C.F.R. § 42.107

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		2.	"wherein said steps of first and second obtaining includes a step of providing said first and second location inputs in a common standardized format" (1.6)	
	C.	Clair	in a common standardized format" (1.6)8 n 259	
	С.	1.	"A method for estimating, for each mobile station M of a	
		1.	plurality of mobile stations" (25.0)	
		2.	"initiating a plurality of requests for information related to the location of said mobile station M, the requests provided to each of at least two mobile station location evaluators" (25.2)	
		3.	"wherein there is at least a first of the requests provided to a first of the location evaluators and a second of the requests, different from the first request, provided to a second of the location evaluators" (25.3)	
		4.	"such that when said location evaluators are supplied with corresponding input data having values obtained using wireless signal measurements obtained via two way wireless communication between said mobile station M, and the communication stations, each of said first and second location evaluators determine corresponding location information related to L_M , and" (25.4)16	
		5.	"wherein for at least one location L of one of the mobile stations, said first location evaluator and said second location evaluator output, respectively, first and second position information related to the one mobile station being at L wherein neither of the first and second position information is dependent upon the other;" (25.5)18	
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37 C.F.R. § 42.104 passim
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Exhibit List

<u>Exhibit No.</u>	Description
2001	<i>The American Heritage Dictionary</i> , p. 575 (3 rd ed., 1994)
2002	Webster's New World College Dictionary, p. 996 (4 th ed., 2010)

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