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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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|     |  |       | claims are unpatentable  |  |
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|     | В.   |       | Claim 1  |  |
|     |  | 1.    | "first obtaining" and "second obtaining."7   |  |
|     |  | 2.    | "wherein said steps of first and second obtaining includes<br>a step of providing said first and second location inputs<br>in a common standardized format" (1.6)  |  |
|     | C.   | Clair | in a common standardized format" (1.6)8<br>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<br>to the location of said mobile station M, the requests<br>provided to each of at least two mobile station location<br>evaluators" (25.2)  |  |
|     |  | 3.    | "wherein there is at least a first of the requests provided<br>to a first of the location evaluators and a second of the<br>requests, different from the first request, provided to a<br>second of the location evaluators" (25.3)   |  |
|     |  | 4.    | "such that when said location evaluators are supplied<br>with corresponding input data having values obtained<br>using wireless signal measurements obtained via two way<br>wireless communication between said mobile station M,<br>and the communication stations, each of said first and<br>second location evaluators determine corresponding<br>location information related to $L_M$ , and" (25.4)16 |  |
|     |  | 5.    | "wherein for at least one location L of one of the mobile<br>stations, said first location evaluator and said second<br>location evaluator output, respectively, first and second<br>position information related to the one mobile station<br>being at L wherein neither of the first and second<br>position information is dependent upon the other;" (25.5)18   |  |
|     |  | 6.    | "obtaining a first collection of location information of<br>said mobile station M, wherein the first collection<br>includes first location information from the first location   |  |

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## **Table of Authorities**

| Cases |
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| Apple Inc. v. ContentGuard Holdings,<br>IPR2015-00440, Paper 11 (July 13, 2015)2   |
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| Billy Goat Industries, Inc., v. Schiller Grounds Care, Inc.,<br>IPR2014-00742, Paper 8 (November 7, 2014)                                      |
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| 37 C.F.R. § 42.104 passim  |
| 37 C.F.R. § 42.22  |

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## Exhibit List

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

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