

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner

v.

MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC,
Patent Owner

Case IPR2015-01724
Patent 5,915,210

**PATENT OWNER MOBILE TELECOMMUNICATIONS
TECHNOLOGIES, LLC'S PRELIMINARY RESPONSE**

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I. BACKGROUND

On August 13, 2015, Samsung Electronics Co., Ltd. filed a Petition for *Inter Partes* Review under 37 C.F.R. § 42.100, requesting *inter partes* review of claims 1, 7-8, 10, 15-17, and 19 of the '210 Patent. Petitioner asserts that claims 1, 7-8, 10, 15-17, and 19 of the '210 Patent are unpatentable over the following references under 35 U.S.C. §§ 102 and 103:

Ground 1 - Claims 1, 7, 10, 16, 17, and 19 as anticipated by *Saalfrank*; and

Ground 2 - Claims 8, 15, and 19 as obvious over *Saalfrank* in view of *Nakamura*.

The '210 Patent, entitled "Method and System for Providing Multicarrier Simulcast Transmission," was filed on July 24, 1997 and issued on June 22, 1999. The '210 Patent claims priority to U.S. Application No. 07/973,918, filed November 12, 1992, U.S. Patent No. 5,590,403 ("the '403 patent").

The '210 Patent describes and claims a method and system for providing multicarrier simulcast transmission.

II. INTRODUCTION

Patent Owner, Mobile Telecommunications Technologies, LLC, submits this Preliminary Response to the Petition for *Inter Partes* Review of claims 1, 7-8, 10, 15-17, and 19 of U.S. Patent No. 5,915,210 ("the '210 Patent"). 37 C.F.R. § 42.107.

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