Paper	No.	

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.

Patent No. 5,915,210 Issued: June 22, 1999 Filed: July 24, 1997

Inventors: Dennis Wayne Cameron, Walter Charles Roehr, Jr., Jai P. Bhagat, Masood Garahi, William D. Hays, David W. Ackerman

Title: METHOD AND SYSTEM FOR PROVIDING MULTICARRIER SIMULCAST TRANSMISSION

Inter Partes Review No. IPR2015-01725

PETITION FOR INTER PARTES REVIEW



TABLE OF CONTENTS

I.	MA	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)1				
	A.	Real	Party-In-Interest Under 37 C.F.R. § 42.8(B)(1)	1		
	В.	Related Matters Under 37 C.F.R. § 42.8(B)(2)				
	C.	Coun	asel Under 37 C.F.R. § 42.8(B)(3) and Service Information	2		
II.	PAY	MENT	MENT OF FEES – 37 C.F.R. § 42.1032			
III.	REQ	REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104				
	A.	Grounds for Standing under 37 C.F.R. § 42.104(A)3				
	B.	Challenge under 37 C.F.R. § 42.104(B) and Relief Requested3				
	C.	C. Claim Construction under 37 C.F.R. §§ 42.104(B)(3)				
		1.	A transmitter (Claims 1 and 10)	5		
		2.	Means for transmitting a [] plurality of carrier signals (C 19)			
		3.	In simulcast (Claims 1, 10, 19)	10		
IV.	SUMMARY OF THE '210 PATENT11					
	A.	Brief	f Description	11		
V	FOF REA	NHIO SONA	OF APPLYING CITED PRIOR ART TO EACH CLAIM CH AN IPR IS REQUESTED, THUS ESTABLISHING A ABLE LIKELIHOOD THAT AT LEAST ONE CLAIM O PATENT IS UNPATENTABLE	F		
	A.	A. [GROUND 1] – Witsaman in view of Bingham Render Claims 1 7-8, 10, 15-17, and 19 Obvious				
		1.	Claim 1	20		
		2.	Claim 7	24		
		3.	Claim 8	2		
		4.	Claim 10	28		



	5.	Claim 15	34
	6.	Claim 16	36
	7.	Claim 17	37
	8.	Claim 19	38
VI.	REDUNDA	NCY	42
VII.	CONCLUS	ION	42



EXHIBITS

SAM1001 – U.S. Patent 5,915,210 to Cameron et al., filed Jul. 24, 1997

SAM1002 – Mobile Telecommunications Technologies, LLC v. Samsung Electronics Co., Ltd., et al., Case No. 2:15-cv-00183, Plaintiff Mobile Telecommunications Technologies, LLC's Original Complaint (Feb. 9, 2015)

SAM1003 – Declaration of Dr. Apostolos (Paul) Kakaes

SAM1004 – Mobile Telecommunications Technologies, LLC v. Clearwire Corp., et al., Case No. 2:12-cv-00308-JRG-RSP, Claim Construction Memorandum and Order (July 1, 2013)

SAM1005 – Mobile Telecommunications Technologies, LLC v. Sprint Nextel Corp., et al., Case No. 2:12-cv-00832-JRG-RSP, Claim Construction Memorandum and Order (May 2, 2014)

SAM1006 – Mobile Telecommunications Technologies, LLC v. T-Mobile USA, Inc., et al., Case No. 2:13-cv-00886-JRG-RSP, Claim Construction Memorandum and Order (Jan. 23, 2015)

SAM1007 – Mobile Telecommunications Technologies, LLC v. Leap Wireless International, Inc., et al., Case No. 2:13-cv-00885-JRG-RSP, Claim Construction Memorandum and Order (May 12, 2015)

SAM1008 – The American Heritage Dictionary of the English Language, 1902, (3rd ed. 1992)

SAM1009 – Standards Coordinating Committee 10, Terms and Definitions, The IEEE Standard Dictionary of Electrical and Electronics Terms, 1140, (6th ed. 1996)

SAM1010 – McGraw-Hill Dictionary of Scientific and Technical Terms, 1644, (5th ed. 1993)

SAM1011 – Apple Inc. v. Mobile Telecommunications Technologies, LLC, Case IPR2014-01036, Decision on Institution of *Inter Partes Review* (Jan. 22, 2015)

SAM1012 – U.S. Patent 5,365,569 to Witsaman et al., filed Aug. 17, 1992



SAM1013 – U.S. Patent 4,968,966 to Jasinski et al., filed Oct. 23, 1989

SAM1014 – Prosecution History of U.S. Patent 5,915,210 to Cameron et al., filed Jul. 24, 1997

SAM1015 – John A. C. Bingham, Multicarrier Modulation for Data Transmission: An Idea Whose Time Has Come, 28 IEEE Communications Magazine 5 (May 1990)

SAM1016 – Bernard Le Floch et al., Digital Sound Broadcasting to Mobile Receivers, 35 IEEE Transactions on Consumer Electronics 493 (Aug. 1989)

SAM1017 - U.S. Patent No. 5,381,449 to Jasper, et al., filed Nov. 1, 1991



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

