

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 IPR2015-01726
Patent 5,659,891

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

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ii. FIG. 1 of <i>Petrovic</i> does not disclose “operating or transmitting said carriers... such that the frequency difference between the center frequency of the	

	outer most of said carriers and the band edge of the mask ... is more than half the frequency difference between the center frequencies of each adjacent carrier,” because not all adjacent carriers operating at the same time	52
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