UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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APPLE INC.,
Petitioner
v.
CORE WIRELESS LICENSING S.A.R.L.,
Patent Owner
_____

Case IPR2015-01899
Patent 8,713,476
_____

Before the Honorable JAMESON LEE, DAVID C. McKONE, and KEVIN W.
CHERRY, *Administrative Patent Judges*.

PETITIONER APPLE INC'S REPLY TO
PATENT OWNER CORE WIRELESS'S RESPONSE

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LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 8,713,476
Ex. 1002	U.S. Patent No. 8,713,476 File History
Ex. 1003	Declaration of Dr. Brad Myers In Support of the Petition for *Inter Partes Review* of United States Patent No. 8,713,476
Ex. 1004	U.S. Patent No. 7,225,409 ("Schnarel")
Ex. 1005	U.S. Patent No. 6,993,362 ("Aberg")
Ex. 1006	U.S. Patent No. 6,333,973 ("Smith")
Ex. 1007	U.S. Patent No. 6,593,945 ("Nason")
Ex. 1008	U.S. Patent No. 5,959,621 ("Nawaz")
Ex. 1009	U.S. Patent No. 6,160,554 ("Krause")
Ex. 1010	U.S. Patent No. 6,256,516 ("Wagner")
Ex. 1011	U.S. Patent No. 6,018,724 ("Arent")
Ex. 1012	U.S. Patent Publication No. 2005/0251448 ("Gropper")
Ex. 1013	U.S. Patent No. 5,345,550 ("Bloomfield 550")
Ex. 1014	U.S. Patent No. 5,425,140 ("Bloomfield 140")
Ex. 1015	U.S. Patent No. 6,408,191 ("Blanchard")
Ex. 1016	U.S. Patent No. 5,815,142 ("Allard")
Ex. 1017	U.S. Patent No. 5,737,394 ("Anderson")
Ex. 1018	U.S. Patent No. 8,434,020 File History
Ex. 1019	Figures 1-14 of U.S. Patent No. 6,593,945 ("Nason Figures") (http://patents.reedtech.com)
Ex. 1020	*Core Wireless Licensing S.A.R.L. v. Apple Inc.*, No. 6:14-cv-00751, D.I. 107, 107-1 (Joint Submission of P.R. 4-5(d) Claim Construction Chart) (E.D. Tex.)
Ex. 1021	*Core Wireless Licensing S.A.R.L. v. Apple Inc.*, No. 6:14-cv-00751, D.I. 89 (Core Wireless Opening Claim Construction Brief) (E.D. Tex.)
Ex. 1022	*Core Wireless Licensing S.A.R.L. v. Apple Inc.*, No. 6:14-cv-00751, D.I. 100 (Apple Responsive Claim Construction Brief) (E.D. Tex.)
Ex. 1023	Declaration of Michael P. Duffey in Support of Petition for *Inter Partes* Review of U.S. Patent No. 8,434,020

Ex. 1024	*Core Wireless Licensing S.A.R.L. v. Apple Inc.*, No. 6:14-cv-00751, D.I. 100-4 and -5 (Apple Responsive Claim Construction Brief Exs. 4 and 5) (E.D. Tex.)
Exs. 1025-1027	Reserved
Ex. 1028	Random House Webster's Computer & Internet Dictionary 3d ed. 1999
Ex. 1029	U.S. Patent No. 7,966,626 ("Kieffer")
Ex. 1030	U.S. Provisional No. 60/180,378
Ex. 1031	Macworld Mac OS 9 Bible, IDG Books, 1999
Ex. 1032	Microsoft Introduces Microsoft Mobile Explorer
Ex. 1033	McGraw-Hill Dictionary of Scientific and Technical Terms 5th ed.1993
Ex. 1034	Dictionary of Computer and Internet Terms 5th ed. 1996
Ex. 1035	Modern Dictionary of Electronics 7th ed. 1999
Ex. 1036	U.S. Patent No. 6,121,968 ("Arcuri")
Ex. 1037	Declaration of Scott S. Taylor
Ex. 1038	Rebuttal Declaration of Dr. Brad A. Myers

The Board correctly found at institution that Petitioner established a reasonable likelihood of prevailing in proving Cls.1, 4, 7-9, 20, and 28-29 unpatentable. Pap.7, 34-35. Because the Petition demonstrates obviousness, PO's Response ignores the references' disclosures, instead urging unsupported constructions (not sought in litigation (Ex.1020)) inconsistent with BRI. PO fails to rebut Petitioner's evidence.

I.   **CLAIM CONSTRUCTION**

   A.   **"application" (cls.1, 20)**

   PO construes "application" (Opp.13-17) without tying it to any issue: no construction is needed, but if construed, its BRI is "a program or group of programs working together to provide access to functions and data." This is consistent with '476, which describes different applications providing access to functions and data (Ex.1001, 1:43-50, 2:34-36, 3:17-33, Fig.1), and with relevant dictionaries and contemporaneous use (*e.g.*, Ex.1028 ("**application** A program or group of programs designed for end users"); Ex.1029, 1:40-47 ("A web application is little more than a set of web pages that support different functionalities."); Ex.1030, 1:17-20; Ex.1031, 4 ("**application program** Software that enables a computer to perform a set of related tasks for a specific purpose, such as…Web browsing."), 5 ("**program** A set of coded instructions that direct a computer in performing a specific task")); Ex.1038¶¶6-7; Ex.1003¶32.

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