

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

CORE WIRELESS LICENSING S.A.R.L.,

Patent Owner.

Case IPR2015-01899

Patent 8,713,476 B2

PATENT OWNER'S PRELIMINARY RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,713,476 UNDER 35 USC §§ 311-319 AND 37 CFR
§42.100 ET SEQ.

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35 U.S.C. § 314(a) 1

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37 C.F.R. § 42.108(c)..... 1

I. INTRODUCTION

Petitioner seeks *inter partes* review of claims 1, 4, 7-9, 20, 28 and 29 of U.S. Patent 8,713,476 (“the ’476 patent”). The Patent Trial and Appeal Board (“PTAB” or “Board”) should not institute *inter partes* review of the ’476 Patent because Petitioner has not met its burden to show a reasonable likelihood that it would prevail with respect to at least one of the challenged claims. 35 U.S.C. § 314(a) (An *inter partes* review may be instituted only if “the information presented in the petition . . . and any response . . . shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.”); 37 C.F.R. § 42.108(c).

The following grounds are asserted by Petitioner:

References	Basis	Claims Challenged
Schnarel ¹ and POSITA	§ 103	1, 4, 7-9, 20, 28, 29
Schnarel and Aberg ²	§ 103	1, 4, 7-9, 20, 28, 29
Schnarel, POSITA and Smith ³	§ 103	4
Schnarel, Aberg and Smith	§ 103	4
Nason ⁴	§ 103	1, 4, 7-9, 20, 28, 29

¹ Schnarel et al., U.S. Patent No. 7,225,409 (Ex. 1004).

² Aberg, U.S. Patent No. 6,993,362 (Ex. 1005).

³ Smith et al., U.S. Patent No. 6,333,973 (Ex. 1006).

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