Filed on behalf of: Unified Patents Inc.
By: Joshua L. Goldberg
P. Andrew Riley
Cara Regan Lasswell
Finnegan, Henderson, Farabow,
Garrett & Dunner, LLP
901 New York Avenue, NW
Washington, DC 20001–4413
Telephone: 202-408-4000
Facsimile: 202-408-4400
E-mail: ISSA_IPRs@finnegan.com

Jonathan Stroud
Unified Patents Inc.
1875 Connecticut Avenue, NW, Floor 10
Washington, DC 20009
Telephone: 202-805-8931
E-mail: jonathan@unifiedpatents.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner

v.

QURIO HOLDINGS, INC.,
Patent Owner

IPR2015-01991
Patent 7,787,904

Personal Area Network Having Media Player and Mobile Device Controlling the Same

---

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 7,787,904

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. INTRODUCTION 1

II. MANDATORY NOTICES 2

A. Real Party-in-Interest 2

B. Related Matters 2

C. Lead and Backup Counsel, and Service Information 2

III. PAYMENT OF FEES 3

IV. STATEMENT OF PRECISE RELIEF REQUESTED 3

A. Statutory Grounds of Challenge 3

B. Claims for Which Review Is Requested 4

C. The Level of Ordinary Skill in the Art at the Time of the Claimed Invention 4

V. THE '904 PATENT 4

VI. GROUNDS FOR STANDING 6

VII. CLAIM CONSTRUCTION 6

A. "media database" 6

B. "when the mobile device is within the WPAN associated with the media device" 7

C. "if the mobile device is simultaneously within the WPAN associated with a first one of the plurality of media devices and the WPAN associated with a second one of the plurality of media devices" 7

VIII. THE CHALLENGED CLAIMS ARE UNPATENTABLE 8

A. Claims 1-3, 12, and 16-17 Would Have Been Obvious over *Lambourne* in View of *Elabbady* 8

1. *Lambourne* 8

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

2. *Elabaddy* 9

3. It would have been obvious to combine the teachings of *Lambourne* and *Elabbady* 10

B. Claims 1-3, 12, and 16-17 Would Have Been Obvious over *Chen* in View of *Plastina 2007* 23

1. *Chen* 23

2. *Plastina 2007* 25

3. It would have been obvious to combine the teachings of *Chen* and *Plastina 2007* 26

C. Claims 4 and 7 Would Have Been Obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in Further View of *Meade* 41

1. *Meade* 41

2. It would have been obvious to combine *Meade* with either the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 42

D. Claims 5 and 8 Would Have Been Obvious over *Lambourne/Elabbady/Meade* or *Chen/Plastina 2007/Meade* in View of *Plastina 2003* 45

1. *Plastina 2003* 45

2. It would have been obvious to combine *Plastina 2003* with either the *Lambourne/Elabbady/Meade* device or the *Chen/Plastina 2007/Meade* device 45

E. Claim 9 Would Have Been Obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in Further View of *Dwek* 47

1. *Dwek* 47

2. It would have been obvious to combine *Dwek* with either the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 47

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

F. Claims 10 and 18 would have been obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in view of *Meade* 48

1. *Meade* 48

2. It would have been obvious to combine *Meade* with either the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 49

G. Claims 10 and 18 Would Have Been Obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in Further View of *Melpignano* 52

1. *Melpignano* 52

2. It would have been obvious to combine the teachings of *Melpignano* with either the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 53

H. Claim 14 Would Have Been Obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in Further View of *Weinans* 56

1. *Weinans* 56

2. It would have been obvious to combine *Weinans* with the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 57

I. Claim 15 Would Have Been Obvious over *Lambourne/Elabbady* or *Chen/Plastina 2007* in Further View of *Willson* 58

1. *Willson* 58

2. It would have been obvious to combine *Willson* with the *Lambourne/Elabbady* device or the *Chen/Plastina 2007* device 59

IX. CONCLUSION.....60

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF AUTHORITIES

Page(s)

Cases

Bayer Healthcare Pharmaceuticals, Inc. v. Watson Pharmaceuticals, Inc.,
713 F.3d 1369 (Fed. Cir. 2013) 53

In re Bigio,
381 F.3d 1320 (Fed. Cir. 2004) 11, 25

In re Yufa,
452 F. App'x 998 (Fed. Cir. 2012) 31

KSR International Co. v. Teleflex Inc.,
550 U.S. 398 (2007).....27

Phillips v. AWH Corp.,
415 F.3d 1303 (Fed. Cir. 2005) (en banc) 6

PlaSmart, Inc. v. Kappos,
482 F. App'x 568 (Fed. Cir. 2012) 27, 31

Statutes

35 U.S.C. § 102..... passim

35 U.S.C. § 103.....3, 4

35 U.S.C. § 311.....4

Rules

37 C.F.R. § 42.100 6

37 C.F.R. § 42.103 3

37 C.F.R. § 42.15 3

37 C.F.R. § 42.8 2

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.