

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner

v.

PERSONALIZED MEDIA COMMUNICATIONS, LLC
Patent Owner

Case No.: IPR2016-00754
Patent No.: 8,559,635

**PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW**

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Statutes

§ 42.100(b)1

PMC's Response rehashes the same arguments PMC made in its Preliminary Response. The Board should again reject these arguments because PMC's proposed claim constructions are not the broadest reasonable constructions and PMC's arguments regarding the prior art are premised on PMC's unsupportable claim constructions.

I. CLAIM CONSTRUCTION

None of PMC's proposed constructions represent the broadest reasonable interpretation in light of the specification ("BRI"). 37 C.F.R. § 42.100(b).

A. "decrypting"-related terms (all Challenged Claims)

PMC re-argues that "decrypt" and "encrypt" are limited to operations that use a digital key on digital data. But PMC's arguments are just as unavailing as before. The Board's rejection of PMC's attempt to exclude descrambling of an analog television signal should stand. Institution Decision at 7-8.

PMC criticizes Apple and the Board for relying on a so-called "controversial" sentence in the specification. Response at 9-11. That statement, considered in its full context, continues to support Apple's position (and the Board's determinations¹) that descrambling of analog television transmissions is

¹ The Board has found on multiple occasions that "decrypt" is not limited to digital data and encompasses descrambling in related PMC patents. Ex. 1011 at

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