

Petitioners' Presentation on Grounds 1-9

October 17, 2017

ZTE (USA) Inc. et al. v. Evolved Wireless LLC
IPR2016-00758, IPR2016-01342,
IPR2017-00068, IPR2017-00106

Grounds 1-9

Ground	Statute	Claim(s)	Reference(s)
1	§ 102	1, 2, 8, 9	Panasonic 792
2	§ 103	3, 10	Panasonic 792 + Panasonic 114
3	§ 103	6, 13	Panasonic 792 + Panasonic 114 + Chu
4	§ 102	1, 2	Panasonic 700
5	§ 103	3	Panasonic 700 + Panasonic 114
6	§ 103	4, 6	Panasonic 700 + Panasonic 114 + Chu
7	§ 103	8, 9	Panasonic 700 + Motorola 595
8	§ 103	10	Panasonic 700 + Panasonic 114 + Motorola 595
9	§ 103	11, 13	Panasonic 700 + Panasonic 114 + Chu + Motorola 595

IPR2016-00758, Paper 24, Consolidation Order, at 4.

Claims 1-2, 8-9, and 15-16

Patent
Owner

Patent Owner is no longer contesting the validity of claims 1-2, 8-9, and 15-16 and therefore addresses only grounds 2-3, 5-6, 8-9, 12-13, and 16-17 and only with respect to claims 3-4, 6, 10-11, and 13 in this Patent Owner Response.

IPR2016-00758, Paper 34, Patent Owner's Response, at 4
(referenced at IPR2016-00758, Paper 38, Petitioner's Reply, at 1) (emphasis added).

Institution Decision



Evolved Wireless argues “as to motivation to combine, the Petition’s allegations are conclusory and unsupported by evidence.” This argument is not persuasive. As shown above, **the Petition includes a detailed and supported showing of reasons to combine the cited Panasonic references.**

IPR2016-00758, Paper 12, Institution Decision, at 18
(referenced at IPR2016-00758, Paper 38, Reply, at 1) (citations omitted, emphasis added).

Reasons to Combine Panasonic References

Petitioner

EW does not dispute most of Petitioner's "detailed and supported showing of reasons to combine the cited Panasonic references," including the following reasons:

- (i) All three Panasonic references are in the same narrow field of endeavor: RACH preamble sequence design in 3GPP TSG RAN WG1.
- (ii) The same company, Panasonic, submitted all three Panasonic references to the same 3GPP working group.
- (iii) All three Panasonic references are directed to the same problem of optimizing the RACH preamble correlation properties.
- (iv) All three Panasonic references propose using repeated preamble sequences.
- (v) Panasonic 114 compared certain sequences with cyclic-shifted sequences and concluded that the cyclic-shifted sequences perform even better.

IPR2016-00758, Paper 38, Reply, at 14.

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