

Paper No. ___

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARRIS Group, Inc.,
Petitioner,

v.

Mobile Telecommunications Technologies, LLC
Patent Owner.

Patent No. 5,915,210

Issued: June 22, 1999

Filed: July 24, 1997

Inventors: Dennis Wayne Cameron, Walter Charles Roehr, Jr., Jai P. Bhagat,
Masood Garahi, William D. Hays, David W. Ackerman

Title: METHOD AND SYSTEM FOR PROVIDING MULTICARRIER
SIMULCAST TRANSMISSION

Inter Partes Review No.: *To Be Assigned*

PETITION FOR *INTER PARTES* REVIEW

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EXHIBITS

ARRIS1001 – U.S. Patent 5,915,210 to Cameron et al., filed Jul. 24, 1997

ARRIS1002 – RESERVED

ARRIS1003 – Declaration of Dr. Apostolos (Paul) Kakaes

ARRIS1004 – Mobile Telecommunications Technologies, LLC v. Clearwire Corp., et al., Case No. 2:12-cv-00308-JRG-RSP, Claim Construction Memorandum and Order (July 1, 2013)

ARRIS1005 – Mobile Telecommunications Technologies, LLC v. Sprint Nextel Corp., et al., Case No. 2:12-cv-00832-JRG-RSP, Claim Construction Memorandum and Order (May 2, 2014)

ARRIS1006 – Mobile Telecommunications Technologies, LLC v. T-Mobile USA, Inc., et al., Case No. 2:13-cv-00886-JRG-RSP, Claim Construction Memorandum and Order (Jan. 23, 2015)

ARRIS1007 – Mobile Telecommunications Technologies, LLC v. Leap Wireless International, Inc., et al., Case No. 2:13-cv-00885-JRG-RSP, Claim Construction Memorandum and Order (May 12, 2015)

ARRIS1008 – The American Heritage Dictionary of the English Language, 1902, (3rd ed. 1992)

ARRIS1009 – Standards Coordinating Committee 10, Terms and Definitions, The IEEE Standard Dictionary of Electrical and Electronics Terms, 1140, (6th ed. 1996)

ARRIS1010 – McGraw-Hill Dictionary of Scientific and Technical Terms, 1644, (5th ed. 1993)

ARRIS1011 – Apple Inc. v. Mobile Telecommunications Technologies, LLC, Case IPR2014-01036, Decision on Institution of *Inter Partes Review* (Jan. 22, 2015)

ARRIS1012 – U.S. Patent 5,365,569 to Witsaman et al., filed Aug. 17, 1992

ARRIS1013 – U.S. Patent 4,968,966 to Jasinski et al., filed Oct. 23, 1989

ARRIS1014 – Prosecution History of U.S. Patent 5,915,210 to Cameron et al., filed Jul. 24, 1997

ARRIS1015 – English Translation of German Patent Publication No. DE4102408 to Saalfrank, filed Jan. 28, 1991

ARRIS1016 – German Patent Publication No. DE4102408 to Saalfrank, filed Jan. 28, 1991

ARRIS1017 – Certificate of Translation of German Patent Publication No. DE4102408 to Saalfrank, filed Jan. 28, 1991

ARRIS1018 – Bernard Le Floch et al., Digital Sound Broadcasting to Mobile Receivers, 35 IEEE Transactions on Consumer Electronics 493 (Aug. 1989)

ARRIS1019 – Yasuhisa Nakamura et al., 256 QAM Modem for Multicarrier 400 Mbit/s Digital Radio, 5 IEEE Journal on Selected Areas in Communications 329 (Apr. 1987)

ARRIS1020 – U.S. Patent No. 5,381,449 to Jasper, et al., filed Nov. 1, 1991

ARRIS1021 – U.S. Patent No. 5,168,509 to Nakamura, et al., filed Apr. 10, 1990

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