UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ARRIS GROUP, INC., ARUBA NETWORKS, INC.,
HEWLETT PACKARD ENTERPRISE COMPANY, and HP, INC.,
Petitioner,

v.

MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC
Patent Owner.

_____

Case IPR2016-00768
Patent 5,659,891[1]

_____

Before MEREDITH C. PETRAVICK, SCOTT A. DANIELS, and
MIRIAM L. QUINN, *Administrative Patent Judges*.

**CORRECTED PETITIONERS' CONSOLIDATED REPLY TO
PATENT OWNER'S RESPONSE**

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[1] Case IPR2016-00766 has been joined with the instant proceeding.

TABLE OF CONTENTS

LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent 5,659,891 to Hays et al., filed June 7, 1995
Ex. 1002	*Mobile Telecommunications Technologies, LLC v. Aruba Networks, Inc., et al.*, Case No. 2:16-cv-00012, Plaintiff Mobile Telecommunications Technologies, LLC's Original Complaint (Jan. 4, 2016)
Ex. 1003	Declaration of Apostolos (Paul) Kakaes
Ex. 1004	*Apple Inc. v. Mobile Telecommunications Technologies, LLC*, Case IPR2014-01035, Decision on Institution of Inter Partes Review (Jan. 22, 2015)
Ex. 1005	*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)
Ex. 1006	*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)
Ex. 1007	*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)
Ex. 1008	The American Heritage Dictionary of the English Language, 1902, (3rd ed. 1992)
Ex. 1009	Standards Coordinating Committee 10, Terms and Definitions, The IEEE Standard Dictionary of Electrical and Electronics Terms, 1140, (6th ed. 1996)
Ex. 1010	McGraw-Hill Dictionary of Scientific and Technical Terms, 1644, (5th ed. 1993)
Ex. 1011	*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)
Ex. 1012	Prosecution History of U.S. Patent 5,659,891 to Hays et al., filed June 7, 1995
Ex. 1013	Rade Petrovic, et al., Permutation Modulation for Advanced Radio Paging, IEEE Proceedings of Southeastcon '93 (Apr. 7, 1993)
Ex. 1014	International Patent WO 89/08355 to Raith et al., filed Feb. 8, 1989

Exhibit	Description
Ex. 1015	C. Alakija and S. P. Stapleton, A Mobile Base Station Phased Array Antenna, 1992 IEEE International Conference on Selected Topics in Wireless Communications 118 (Jun. 1992)
Ex. 1016	IPR2015-01726, Paper No. 9 (Institution Decision)
Ex. 1017	IPR2016-00768, Conference Call Hearing on Motions (Apr. 20, 2016)
Ex. 1018	Rebuttal Declaration of Dr. Apostolos K. Kakaes
Ex. 1019	U.S. Patent No. 5,590,403
Ex. 1020	Declaration of Marissa B. Golub

~~The Board correctly found at institution that Petitioners established a reasonable~~

~~likelihood of prevailing in proving claims 1-5 ("Claims") unpatentable.~~

IPR2016-00768, Pap. 13 ("Inst."), 2.

_____ ~~Because the Petition demonstrates unpatentability,~~ Patent

Owner's ("PO") Response ("POR," Pap. 28)

_____ ~~improperly injects limitations into the~~

~~Claims, and ignores the references' plain disclosures. PO fails to rebut Petitioners'~~

~~evidence.~~ [2], [3]

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[2] PO fails to cite and waives any arguments in Ex. 2011 ¶¶ 1-8, 10-18, 39, 43, 45,

47, 59-60, 64, 70, 79-80, 86, 88-92, 97-98, 100-104, 107-108, 111, 113, 123-126,

129-134. Pap. 14, 3; 37 C.F.R. § 42.6(a)(3). Arguments _____ ~~in~~

~~PO's Preliminary Response~~ not made in POR are waived. *Id.*

[3] ~~Emphasis added, internal quotations/citations omitted, unless noted.~~

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