UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARRIS GROUP, INC. Petitioner

v.

TQ DELTA, LLC Patent Owner

Case: IPR2016-01160 Patent 8,611,404

Before SALLY C. MEDLEY, KALYAN K. DESHPANDE, and TREVOR M. JEFFERSON, *Administrative Patent Judges*

PETITIONER'S ITEMIZED LISTING PURSUANT TO PAPER 22

Pursuant to the Board's Order, Paper 22, Petitioner respectfully submits this itemized listing identifying specific portions in Patent Owner's Response ("PO Response" Paper 16), as the material that prompted or caused the Petitioner to include in its Reply each item listed by Patent Owner in Paper 23:

- 1) PO Response p. 2, lines 1-6 ("First, Petitioner . . .").
- 2) PO Response p. 2, lines 10-15 ("The Board relied . . .").
- 3) PO Response p. 2, line 16 ("Third, Petitioner . . .") p. 3, line 2; p. 44, lines
 9-18 ("Bowie, however, does . . .").
- 4) PO Response, p. 2, line 20 ("Bowie teaches . . .") p. 3, line 2; p. 3, lines 8-11 ("In contrast . . .").
- 5) PO Response, p. 3, line 12 ("Fifth, Petitioner has not \dots ") p. 4, line 2.
- 6) PO Response, p. 4, lines 3-8 ("Sixth, Petitioner's general arguments . . .");p. 18, lines 8-14 ("In addition, the Bowie device . . .").
- 7) PO Response, p. 10, lines 4-7 ("As discussed below . . ."); p. 10, lines 13-18 ("Bowie's system differs . . .").
- 8) PO Response, p. 23, line 5 ("In light . . .") p. 24, line 5.
- 9) PO Response, p. 24, line 11 ("The 404 patent . . .") p. 25, line 12.
- 10) PO Response, p. 28, lines 12-17 ("Bowie, however . . .").
- 11) PO Response, p. 31, line 21 ("Loop characteristics . . .") p. 36, line 10.
- 12) PO Response, p. 37, line 1 ("Bowie teaches . . .") p. 38, line 10.

- 13) PO Response, p. 39, lines 4-19 ("And, as discussed . . ."); p. 40, lines 1-10 ("In addition . . .").
- 14) PO Response, p. 39, lines 4-20 ("And, as discussed . . ."); p. 40, lines 1-10 ("In addition . . ."); p. 45, lines 3-4 ("Petitioner has not . . .").
- 15) PO Response, p. 42, line 9 ("Bowie and . . .") p. 43, line 16.
- 16) PO Response, p. 45, line 3 ("Petitioner has not met . . .") p. 46, line 10.
- 17) PO Response, p. 45, line 3 ("Petitioner has not met . . .") p. 46, line 10.
- 18) PO Response, p. 49, lines 9-11 ("In fact, Bowie . . ."); p. 51, lines 4-7 ("Moreover, a POSITA . . ."); page 51, lines 14-16 ("Modifying the Bowie unit . . .").
- 19) PO Response, p. 52, lines 3-16 ("Indeed, the intended purpose . . .")
- 20) PO Response, p. 54, lines 16-20 ("Accordingly, modifying . . ."); page 55, lines 6-9 ("Modifying the . . ."); page 57, lines 1-8 ("This would render . . ."); page 57, lines 17-18 ("Those reasons, however . . ."); page 59, line 16 ("Petitioner's conclusory . . .") page 61, line 17.
- 21) PO Response, p. 54, lines 16-20 ("Accordingly, modifying . . ."); page 55, lines 6-9 ("Modifying the . . ."); page 57, lines 1-8) ("This would render . . ."); page 57, lines 17-18 ("Those reasons, however . . ."); page 59, line 15 ("Petitioner's conclusory . . .") page 61, line 17.

Dated: August 9, 2017

IPR2016-01160 Patent 8,611,404

Respectfully submitted,

/Charles W. Griggers/

Charles W. Griggers Reg. No. 47,283 *Thomas/Horstemeyer, LLP Attorneys for ARRIS Group, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petitioner's Itemized Listing Pursuant to Paper 22** was served on August 9, 2017, via electronic mail, per agreement of the parties, to counsel for the following addresses:

Peter McAndrews (Reg. No. 38,547) at pmcandrews@mcandrews-ip.com Thomas J. Wimbiscus (Reg. No. 36,059) at twimbiscus@mcandrews-ip.com Scott P. McBride (Reg. No. 42,853) at smcbride@mcandrews-ip.com Christopher M. Scharff (Reg. No. 53,556) at cscharff@mcandrews-ip.com

> By: <u>/Charles W. Griggers/</u> Charles W. Griggers Reg. No. 47,283 Attorney for Petitioner