

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

FASTVDO LLC,
Patent Owner.

Patent No. 5,850,482

Inter Partes Review No. _____

PETITION FOR *INTER PARTES* REVIEW

UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ.*

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Appendix of Exhibits for Inter Partes Review of U.S. Patent No. 5,850,482

Exhibit Description	Ex. #
<i>U.S. Patent No. 5,850,482 to Meany et al. [referenced as “the ’482 patent” or, simply, “’482”]</i>	1001
<i>Declaration of Dr. Andrew Lippman [referenced as “Lippman”] (includes Dr. Lippman’s CV as Exhibit A thereto)</i>	1002
<i>U.S. Patent No. 5,392,037 to Kato [referenced as “Kato”]</i>	1003*
<i>E. Fiala et al., Data Compression with Finite Windows, Communications of the ACM, Vol. 32, No. 4, pp. 490-505 (1989) [referenced as “Fiala”]</i>	1004*
<i>K. Fazel et al., Application of Unequal Error Protection Codes on Combined Source-Channel Coding of Images, International Conference on Communications, Including SuperComm Technical Sessions (IEEE), Atlanta, April 15 19, 1990, Vol. 3, pp. 898-903 [referenced as “Fiala”]</i>	1005*
<i>U.S. Patent No. 5,218,622 to Fazel et. al. [referenced as “Fiala”]</i>	1006*
<i>Wallace, “The JPEG Still Picture Compression Standard,” IEEE Transactions on Consumer Electronics, Vol. 38, No. 1, Feb. 1992 [referenced as “Wallace”]</i>	1007
<i>Lin, “Codes with Multi-Level Error-Correcting Capabilities,” Discrete Mathematics 83 (1990), pp. 301-14 [referenced as “Lin”]</i>	1008
<i>Printout from Wiley & Sons website showing that R.G. Gallager, Information Theory and Reliable Communication (1968) is a 608-page book (http://www.wiley.com/WileyCDA/WileyTitle/productCd-0471290483.html)</i>	1009
<i>January 26, 1998 Amendment in prosecution history of ’482 patent</i>	1010
<i>June 1, 2016 FastVDO First Amended Preliminary Claim Constructions in pending litigation on ’482 patent</i>	1011
<i>June 9, 2016 email exchange with FastVDO re claim construction</i>	1012

*Prior art relied upon as grounds for unpatentability in this Petition.

Petitioner Apple Inc. (“Petitioner”) respectfully petitions for *inter partes* review of claims 1-3, 5-14, 16-17, 22-26, and 28-29 of U.S. Patent No. 5,850,482 (“the ’482 patent” (Ex. 1001)) in accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.*

I. NOTICES AND STATEMENTS

Pursuant to 37 C.F.R. § 42.8(b)(1), Apple Inc. is the real party-in-interest.

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner identifies the following related cases in which the ’482 patent has been asserted, all but one of which is currently pending:

- *FastVDO LLC v. AT&T Mobility LLC et al.*, Case No. 3:16-cv-00385
- *FastVDO LLC v. LG Electronics, Inc. et al.*, Case No. 3:16-cv-00386
- *FastVDO LLC v. NEC Corp. et al.*, Case No. 3:16-cv-00389
(terminated)
- *FastVDO LLC v. Nokia Corp. et al.*, Case No. 3:16-cv-00390
- *FastVDO LLC v. ZTE Corp. et al.*, Case No. 3:16-cv-00394
- *FastVDO LLC v. Dell Inc. et al.*, Case No. 3:16-cv-00395
- *FastVDO LLC v. Huawei Technologies Co., Ltd. et al.*, Case No. 3:16-cv-00396

Petitioner is a defendant in the first-listed case. Each of the above-listed cases was originally filed in the Eastern District of Texas in early June 2015, before being

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