

IPR 2016-01209
U.S. Patent No. 7,746,916

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC., HTC CORPORATION, HTC AMERICA, INC.,
MICROSOFT CORPORATION, MICROSOFT MOBILE OY, MICROSOFT
MOBILE, INC., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC., and ZTE (USA) INC.,

Petitioner,
v.

EVOLVED WIRELESS, LLC,
Patent Owner.

Case IPR2016-01209¹
Patent 7,746,916 B2

Before CHRISTOPHER L. CRUMBLEY, PATRICK M. BOUCHER, and
TERRENCE W. McMILLIN, *Administrative Patent Judges*.

**PATENT OWNER'S RESPONSE TO
PETITIONERS' PETITION FOR INTER PARTES REVIEW OF
UNITED STATES PATENT NO. 7,746,916**

¹ IPR2016-01280 has been consolidated with this proceeding.

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1. Zhuang175 does not disclose a unitary device that includes a “code sequence generator.”	24
2. Even under Petitioners’ construction of “code sequence generator,” Zhuang175 does not disclose a generator that both cyclically extends and circularly shifts code sequences.	27

B. The combination of Fukuta and Zhuang175 does not disclose the invention as a whole because Fukuta does not disclose the claimed “code sequence generator.” [Grounds 5 and 6; claims 6-10]30

C. The Petition does not demonstrate by a preponderance of the evidence that a person of ordinary skill in the art would be motivated to modify Fukuta in combination with Zhuang175. [Grounds 5 and 6; claims 6-10].....35

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