UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) Inc.,
HTC Corporation, and
HTC America, Inc.,

Petitioner

v.

Evolved Wireless LLC,

Patent Owner

PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,881,236

Case No. IPR2016-00757

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A. "transmitting the data stored in the Msg3 buffer to the base station using the UL Grant signal received on the specific message, if there is data stored in the Msg3 buffer when receiving the UL Grant signal on the specific

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message and the specific message is the random access response message" (claim 1) 16

B. "acquiring the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message" (claim 7) 19

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1. Independent claim 1 is invalid. 22

2. Dependent claim 2 is invalid 40

3. Dependent claim 3 is invalid 41

4. Dependent claim 4 is invalid 42

5. Dependent claim 5 is invalid 44

6. Dependent claim 6 is invalid 45

7. Skilled artisans would have combined the teachings of the 300 and 321 references. 46

B. Ground 2: Claims 7-10 and 12-13 are invalid based on the prior art specifications and the Ericsson patent 48

1. Independent claim 7 is invalid. 48

2. Dependent claim 8 is invalid 53

3. Dependent claim 9 is invalid 55

4. Dependent claim 10 is invalid 57

5. Dependent claim 12 is invalid 57

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6. Dependent claim 13 is invalid.....57

7. Skilled artisans would have combined the prior art specifications' teachings with the Ericsson patent's teachings.....58

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EXHIBIT LIST

Exhibit No.	Short Name	Description
1001	236 patent	U.S. Patent No. 7,881,236
1002	300 reference	3GPP TS 36.300 v8.4.0 (2008-03), 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA) and Evolved Universal Terrestrial Radio Access Network (E-UTRAN); Overall description; Stage 2 (Release 8)
1003	321 reference	3GPP TS 36.321 v8.2.0 (2008-05), 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA) Medium Access Control (MAC) Protocol Specification (Release 8)
1004	Ericsson patent	U.S. Patent No. 9,204,468
1005	Philips submission	Change Request R2-081764, submitted by Philips and NXP Semiconductors to 3GPP TSG RAN WG2 for Meeting #61bis, held on March 31 to April 4, 2008, in Shenzhen, China
1006	236 file history	File history of U.S. Patent Application No. 12/538,514, which issued as the 236 patent
1007	36.300 specs listing	Printout of http://www.3gpp.org/ftp/Specs/archive/36_series/36.300/
1008	Qualcomm 156	"NDI and Message 3," R2-084156, submitted by Qualcomm Europe to 3GPP TSG RAN WG2 for Meeting #63 held in Jeju Island, Korea on August 18 to August 22, 2008

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