IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioners,

V.

FOCAL IP, LLC,

Patent Owner

Case IPR2016-01254 Patent 8,457,113 B2

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



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BURGER (GROUNDS 1/2) AND ARCHER (GROUNDS 3/4) DISCLOSE EACH LIMITATION	
A.	Burger (Ground 1) Discloses Interconnecting an Enhanced Services Platform (e.g. "web-enabled processing system") on an IP Network to a Tandem Switch in the PSTN
В.	Archer (Ground 3) Discloses a Gateway Interconnecting a Controller (e.g. "web-enabled processing system") on an IP Network to a Tandem Switch in the PSTN
C.	A POSA Understood that an IP Network Converging with the PSTN Could Be Connected to Either a PSTN Tandem Switch or PSTN Edge Switch
D.	Burger in view of Alexander (Ground 2) Discloses a Gateway Interconnecting (e.g. "web-enabled processing system") on an IP Network to a Tandem Switch in the PSTN
E.	Archer in view of Chang (Ground 4) Discloses a Gateway Interconnecting a Controller (e.g. "Web-enabled Processing System") on an IP Network to a Tandem Switch in the PSTN
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PETITIONERS' REPLY EXHIBIT LIST

Exhibit Number	Document
1001	U.S. Patent No. 8,457,113 ("the '113 Patent")
1002	Declaration of Dean Willis
1003	U.S. Patent No. 6,353,660 to Burger
1004	U.S. Patent No. 6,683,870 to Archer
1005	U.S. Patent No. 5,958,016 to Chang
1006	U.S. Patent No. 6,798,767 to Alexander
1007	File history of U.S. Patent No. 8,457,113
1008	File history of U.S. Patent No. 7,764,777
1046	U.S. Patent No. 6,442,169 to Lewis
1047	U.S. Patent No. 6,6 <u>3</u> 33,931 to LaPier
1048	May 8, 2017 Transcript of Deposition of Regis "Bud" Bates
1049	May 9, 2017 Transcript of Deposition of Regis "Bud" Bates
1050	March 1, 2017 Transcript of Deposition of Mr. Willis in IPR2016-01254, IPR2016-01257
1051	U.S. Patent No. 5,164,879 (Honeywell v. ITT)
1052	U.S. Patent No. 6,618,707 (Chi. Bd. Options)
1053	U.S. Patent No. 4,893,306 (Telcordia Techs.)
1054	U.S. Patent No. 7,764,777 ("the '777 patent")
1055	U.S. Patent No. 8,115,298 ("the '298 patent")
1056	U.S. Patent No. 6,574,328 to Wood
1057	U.S. Patent No. 7,324,635 to Wood
2019 <u>1058</u>	Deposition Transcript of Dr. La Porta, Feb. 24, 2017, for IPR 2016-01259, -01261, -01262, and -01263.
<u>1059</u>	Petitioner's Redlined Reply to PO Response



Case IPR2016-01254 U.S. Patent No. 8,457,113

Exhibit Number	Document
2020	Deposition Transcript of Dr. La Porta, Feb. 23, 2017, for IPR
	2016-01259, -01261, -01262, and -01263.
2022	Declaration of Regis J. "Bud" Bates in Support of Patent
	Owner's Response
2040	Declaration of Regis J. "Bud" Bates in Support of PO's
	Contingent Motion to Amend in IPR2016-01261



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