Filed on behalf of YMax Corporation

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YMAX CORPORATION,
Petitioner

v.

FOCAL IP, LLC
Patent Owner

Case IPR2016-01258
U.S. Patent No. 7,764,777

PETITIONER'S OPPOSITION TO

PATENT OWNER'S MOTION TO AMEND

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1003	U.S. Patent No. 6,463,145 to O'Neal et al. ("O'Neal")
1004	W. Bressler, SS7 Level Two over IP, dated January 1999
1005	U.S. Patent No. 6,381,323 to Schwab et al. ("Schwab")
1006	Prosecution history of U.S. Patent No. 6,529,596
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1008	Federal Standard 1037C (Glossary of Telecommunications Terms) (Aug. 7, 1996)
1009	Newton's Telecom Dictionary (February 1999)
1010	http://www.internetlivestats.com/total-number-of-websites
1011	U.S. Patent No. 8,457,113 to Wood et al.
1012	ITU-T Specification of Signaling System No. 7 Q.700 dated March 1993
1013	http://www.thefreelibrary.com/eBay's+AuctionWeb+Tops+One+Million+Bids%3B+Leading+Online+Auction...-a018940197
1014	B. Leiner, et al., The Past and Future History of the Internet, Communication of the ACM, Feb. 1997, Vol. 40, No. 2
1015	U.S. Patent No. 6,031,836 to Haserodt
1016	Curriculum vitae for Tal Lavian, Ph.D.
1017	ITU-T Recommendation Q.700-Q.705. Introduction to CCITT Signaling System Number 7. Melbourne 1988-1992
1018	http://www.speakfreely.org/history.html
1019	Lucent Technologies and Ascend Communications announce voice over IP interoperability, dated June 2, 1999
1020	C. Huitema, et al., Media Gateway Control Protocol (MGCP) Call Flows, dated January 20, 1999
1021	C. Huitema, et al., Media Gateway Control Protocol (MGCP) Call

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	Flow Test Case 1, dated February 25, 1999
1022	The iNOW! [VoIP Interoperability Now!] Joint Press Release, dated December 19, 1998
1023	L. Ong, et al. Framework Architecture for Signaling Transport, dated October 1999
1024	U.S. Patent No. 5,333,185 ("Burke")
1025	U.S. Patent No. 5,574,781 ("Blaze")
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