Reply to Patent Owner's Response IPR 2016-01261 U.S. Patent No. 8,457,113

### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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### BEFORE THE PATENT TRIAL AND APPEAL BOARD

Bright House Networks, LLC, WideOpenWest Finance, LLC, Knology of Florida, Inc.

Birch Communications, Inc.,

Petitioners

v.

Focal IP, LLC, Patent Owner

.....

Case No. IPR2016-01261 U.S. Patent No. 8,457,113

Before SALLY C. MEDLEY, JONI Y. CHANG, and BARBARA A. PARVIS, ADMINISTRATIVE PATENT JUDGES.

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE



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II.	ARCHER (GROUND 1), AND ARCHER IN VIEW OF CHANG (GROUND 2) DISCLOSE EACH LIMITATION OF THE CHALLENGED CLAIMS		
	A.	Archer Discloses a Gateway Interconnecting a Controller (e.g. "web-enabled processing system") on an IP Network to a Tandem Switch in the PSTN	
	В.	A POSA Understood that an IP Network Converging with the PSTN Could Be Connected to Either a PSTN Tandem Switch or PSTN Edge Switch and Without any Technical Differences	
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	B.	Patent Owner's Alleged Evidence of Disclaimer in the Shared Specification is Inapposite as it Refers to "Preferred"	
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## PETITIONERS' REPLY EXHIBIT LIST

<b>Exhibit Number</b>	Document
1001	U.S. Patent No. 8,457,113 ("the '113 Patent")
1002	Expert Declaration of Dr. Thomas F. La Porta
1003	U.S. Patent No. 6,683,870 to Archer ("Archer")
1004	U.S. Patent No. 5,958,016 to Chang et al. ("Chang")
1006	U.S. Patent No. 7,764,777 ("the '777 Patent")
1007	U.S. Patent No. 8,115,298 ("the '298 Patent")
1009	File history of U.S. Patent No. 8,457,113
1010	File history of U.S. Patent No. 7,764,777
1055	U.S. Patent No. 6,574,328
1056	U.S. Patent No. 7,324,635
1057	U.S. Patent No. 6,442,169 to Lewis ("Lewis")
1058	U.S. Patent No. 6,333,931 to LaPier ("LaPier")
1059	May 8, 2017 Transcript of Deposition of Regis "Bud" Bates
1060	May 9, 2017 Transcript of Deposition of Regis "Bud" Bates
1061	March 1, 2017 Transcript of Deposition of Mr. Willis in IPR2016-01254, IPR2016-01257
1062	U.S. Patent No. 5,164,879 (Honeywell v. ITT)
1063	U.S. Patent No. 6,618,707 (Chi. Bd. Options)
1064	U.S. Patent No. 4,893,306 (Telcordia Techs.)
1065	Expert Declaration of Dr. Thomas F. La Porta in Support of Reply
2019	Deposition Transcript of Dr. La Porta, Feb. 24, 2017, for IPR 2016-01259, -01261, -01262, and -01263.
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 in IPR2016-01261



# Reply to Patent Owner's Response IPR 2016-01261 U.S. Patent No. 8,457,113

<b>Exhibit Number</b>	Document
2042	U.S. Pat. App. No. 11/948, 965, filed on November 20, 2007
	(annotations added by Patent Owner)
2043	U.S. Pat. App. No. 10/426,279, filed on April 30, 2003
	(annotations added by Patent Owner)
2044	U.S. Pat. App. No. 09/565,565, filed on May 4, 2000
	(annotations added by Patent Owner)

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