

Cisco Systems, Inc., Petitioner

VS.

TQ Delta, LLC Patent Owner

PETITION FOR INTER PARTES REVIEW

OF

U.S. PATENT NO. 8,611,404



TABLE OF CONTENTS

PETITIONER'S EXHIBIT LISTiv					
I.	Maı	ndatory Notices	1		
	A.	Real Party-in-Interest	1		
	B.	Related Matters	1		
	C.	Lead and Back-up Counsel and Service Information	2		
II.	Gro	ounds for Standing	2		
III.	Req	juested Relief	2		
IV.	Rea	sons for the Requested Relief	2		
	A.	Summary of the '404 Patent	3		
	B.	Prosecution History	7		
	C.	Summary of the Petition	8		
	D.	Challenged Claims	9		
V.	Clai	im Construction	9		
	A.	"store/storing, in a/the low power mode" (claims 6, 11, 16)	9		
	B.	"synchronization signal" (claims 6, 11, 16)	11		
VI.	Stat	cutory Grounds for Challenges	12		
VII.	Lev	rel of Ordinary Skill in the Art	13		
VIII	.Not	e Regarding Page Citations	13		
IX.	Ider	ntification of How the Claims are Unpatentable	13		
	A.	Summary of Bowie	14		



	B.	Sun	nmary of Yamano	16
	C.	Mo	dem States in Bowie and Yamano	19
	D.	Sun	nmary of ANSI T1.413	23
	E.	Rea	asons to Combine Bowie and Yamano	25
	F.	Rea	asons to Combine Bowie/Yamano with ANSI T1.413	27
	G.		tims 6, 10, 11, 15, 16, and 20 are obvious under 35 U.S.C. 03(a) over Bowie in view of Yamano and ANSI T1.413	29
		1.	Claim 6	29
		2.	Claim 10	44
		3.	Claim 11	46
		4.	Claim 15	59
		5.	Claim 16	59
		6.	Claim 20	60
X.	Con	ıclusi	ion	62
ΧI	Cer	tifica	ate of Word Count	63

PETITIONER'S EXHIBIT LIST

July 20, 2016

- 1001 U.S. Patent No. 8,611,404 to Greszczuk et al.
- 1002 Prosecution File History of U.S. Patent No. 8,611,404
- 1003 Declaration of Sayfe Kiaei under 37 C.F.R. § 1.68
- 1004 Curriculum Vitae of Dr. Sayfe Kiaei
- 1005 U.S. Patent No. 5,956,323 to Bowie
- 1006 U.S. Patent No. 6,075,814 to Yamano et al.
- 1007 ANSI T1.413-1995
- 1008 Declaration of David Bader
- 1009 U.S. Patent No. 6,084,881 to Fosmark et al.



I. MANDATORY NOTICES

A. Real Party-in-Interest

The Petitioner and real party in interest is Cisco Systems, Inc.

B. Related Matters

To the best knowledge of the Petitioner, U.S. Patent No. 8,611,404 ("the '404 Patent") is involved in the following litigations:

Name	Number	Court	Filed
TQ Delta LLC v. ADTRAN Inc.	1-14-cv-00954	DED	Jul. 17, 2014
TQ Delta LLC v. Comcast Cable Comms. LLC	1-15-cv-00611	DED	Jul. 17, 2015
TQ Delta LLC v. CoxCom, LLC	1-15-cv-00612	DED	Jul. 17, 2015
TQ Delta LLC v. DIRECTV	1-15-cv-00613	DED	Jul. 17, 2015
TQ Delta LLC v. DISH Network Corp.	1-15-cv-00614	DED	Jul. 17, 2015
TQ Delta LLC v Time Warner Cable Inc.	1-15-cv-00615	DED	Jul. 17, 2015
TQ Delta LLC v. Verizon Comms., Inc.	1-15-cv-00616	DED	Jul. 17, 2015

The '404 Patent is also involved in the following related matter:

Name	Number	Court	Filed
Petition for Inter Partes Review of the '404 Patent by ARRIS Group, Inc.	IPR2016-01160	PTAB	Jun. 6, 2016



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

