

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

Sony Corporation,
Petitioner,

v.

One-E-Way, Inc.
Patent Owner.

IPR2016-01639

Patent No. 9,282,396

Issue Date: March 8, 2016

Title: Wireless Digital Audio Music System

**REPLY IN SUPPORT OF PETITION FOR *INTER PARTES*
REVIEW OF U.S. PATENT NO. 9,282,396 UNDER
35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 ET SEQ.**

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Patent No. 9,282,396

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Petitioner Sony Corporation hereby submits a reply in support of its Petition for *inter partes* review of claims 1-17 of U.S. Patent No. 9,282,396 (“the ’396 patent”) (Ex. 1001).

I. PATENT OWNER DOES NOT DISPUTE CERTAIN FACTS

In its response, Patent Owner does not dispute certain facts relevant to this *inter partes* review. Patent Owner does not dispute the description of the ’396 patent invention, and that the references the Petitioner relies upon are prior art to the ’396 patent. Patent Owner also does not dispute the level of a person of ordinary skill in the art. *See* Paper 23. Therefore, these facts should be considered established by the Petitioner for purposes of this *inter partes* review.

II. RESPONSES TO PATENT OWNER SPECIFIC ARGUMENTS FOR EACH GROUND

A. Ground 1

The ’892 Patent Anticipates Claims 1-17 of the ’396 Patent.

1. The ’892 Patent disclosure incorporates the 1998 Haartsen paper by reference and should be considered a single piece of prior art

The ’892 patent, disclosing an improved element of a larger system, incorporates by reference the 1998 paper written by the inventor Haartsen (“the 1998 paper”), disclosing a complete Bluetooth system. As discussed in the Petition and agreed by the Board in its Institution Decision (“Thus, we agree with Petitioner that Haartsen sufficiently incorporates by reference the entire disclosure of the 1998

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