

# Patent Owner Caltech's Oral Argument April 19, 2018

Apple, Inc. v. California Institute of Technology.  
Case No. IPR2017-00210

# Instituted Grounds

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## IPR2017-00210: Patent No. 7,116,710

Ground	Claims	Basis	Prior Art
1	1, 3	102	Frey
2	1-8, 11-14	103	Frey and Divsalar
3	15-17, 19-22, 24-33	103	Frey, Divsalar, and Luby97

IPR2017-00210  
Ground 1: Frey

## No “obtaining a block of data”

- ▶ Petitioner admits that “block length  $N = 131,072$ ” refers to the format and length of the *output*, not input. Reply 5.

35 (citing Ex. 1002, p. 6). This is incorrect. The term “block length N” used by Frey refers to the codeword that is the result of the encoding process (*i.e.*, not to any input). One of ordinary skill would have understood N refers to the length of the codeword. For example, Frey refers to “a decoder [that] computes the channel

EX2004 (MM Decl.) (“MM”) ¶63

## No “partitioning said data block”

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- ▶ Petitioner misreads Figure 2, which depicts a codeword.

Figure 2: A general *irregular turbocode*. For  $d = 1, \dots, D$ , fraction  $f_d$  of the codeword bits are repeated  $d$  times, permuted and connected to a convolutional code.

EX1002, p. 4

- ▶ Petitioner does not substantiate its inherency theory. Irregular repetition can be achieved without partitioning.

partitioning. One can certainly envision an implementation of Frey that performs irregular repetition without partitioning. For example, the input stream of bits could be received bit-by-bit with each bit being repeated as soon it is received.

MM ¶69

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