

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioner

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG S.A.,
Patent Owners

Case IPR2017-00221 (Patent 7,353,890)

Case IPR2017-00222 (Patent 8,243,723)

Case IPR2017-00225 (Patent 8,995,433)

**JOINT FILING LISTING
OBJECTIONS TO DEMONSTRATIVES**

Pursuant to the Board's Order that the parties may file jointly a one-page list of objections, the parties submit the following:

Uniloc's objections

1. Uniloc objects to the following slides because they seek to introduce new argument and evidence without citation to the briefing: (a) slides 4-5, 38-43 for IPR2017-00221; and (b) slides 5 - 6, 16, 34, 43 and 51-57 for IPR2017-0225. *CBS Interactive Inc. v. Helferich Patent Licensing, LLC*, IPR2013-00033, Paper 118 at 2 (Oct. 23, 2013) (“*CBS*”).
2. Uniloc objects to the following slides because they seek to introduce arguments and evidence that were impermissibly raised for the first time in Petitioner's reply (including Petitioner's new argument that an “internal server system” means a server with “multiple components”): (a) 7, 19-22, 24, 28-29, 32-36 of IPR2017-0221; and (b) 8, 12-13, 21, 26, 29-30, 49 for IPR2017-0222. *See* 37 C.F.R. § 42.23; *Intelligent Bio-Systems, Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359 (Fed. Cir. 2016) (“Unlike district court litigation—where parties have greater freedom to revise and develop their arguments over time and in response to newly discovered material—the expedited nature of IPRs bring with it an obligation for petitioners to make their case in their petition to institute.”).
3. Uniloc objects to the demonstratives as being overly cumbersome for the Board and Uniloc to determine whether something is new by totaling 237 pages in total and by making multiple arguments and citing multiple pages of sources without identifying which pages of which sources support which arguments. *CBS* at 4.

Petitioner's objections

None.

Date: February 1, 2018

Respectfully submitted,

By: /s/ Brett A. Mangrum

Brett A. Mangrum

Attorney for Patent Owners

Reg. No. 64,783

/Jason D. Eisenberg/

Jason D. Eisenberg

Registration No. 43,447

Attorney for Petitioner Apple Inc.

CERTIFICATE OF SERVICE

I certify that an electronic copy of the foregoing JOINT FILING LISTING
OBJECTIONS TO DEMONSTRATIVES was served via email to Petitioner's
counsel of record at the following address:

PETITIONER:

Jason D. Eisenberg: jasone-PTAB@skgf.com

Michael D. Specht: mspecht-PTAB@skgf.com

Zhu He: zhe-PTAB@skgf.com

Date: February 1, 2018

Respectfully submitted,

By: /s/ Brett A. Mangrum

Brett A. Mangrum
Attorney for Patent Owners
Reg. No. 64,783