

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., SNAP INC., FACEBOOK, INC., and WHATSAPP, INC.,
Petitioner

v.

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

Case IPR2017-00221¹
Patent 7,535,890

**PETITIONER APPLE INC.'S
REPLY TO PATENT OWNER RESPONSE**

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¹ Snap Inc., who filed a petition in IPR2017-01612, as well as Facebook, Inc. and WhatsApp, Inc., who filed a petition in IPR2017-01636, have been joined as petitioners in this proceeding.

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I. Introduction1

II. PO relies on unreasonably narrow claim construction for local and external networks and recipients unsupported by the specification.....1

 A. Nothing in the '890 Patent requires a “local network” be a different type of network than an “external network” – rather their respective locations can be structurally and operationally the same.....1

 B. “Recipient” simply means *recipient client device*, its plain and ordinary meaning, and not *specific client device* as proposed by PO.4

III. The prior art teaches or suggests every element of the challenged claims.5

 A. The prior art teaches or suggests a “local network” and an “external network” under either party’s construction.....5

 1. Even assuming that PO’s construction of local and external networks is correct, the prior art teaches or suggests different types of network.5

 2. It’s obvious to use Malik’s FIG. 3 VIM server in conjunction with Malik’s FIG. 2 architecture.8

 3. Malik-Väänänen does not teach away from the claims or their obvious combination.11

 4. Malik-Väänänen teaches claim 14.12

 5. Malik-Väänänen teaches claim 28.13

 B. Malik-Väänänen teaches “the client selecting one or more recipients.”18

 1. Malik does not teach away from the claims and its modification based on Väänänen.18

 2. A POSITA would have been motivated to modify Malik to select one or more recipients.20

 3. Selecting one or more recipients was well-known in the art.23

 4. There are no weaknesses in the Malik-Väänänen combination regarding teaching or suggesting the challenged claims.23

 C. The Malik-Väänänen combination teaches or suggests “transmitting the selected recipients.”24

IV. Conclusion.25

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBIT	DESCRIPTION
1001	Rojas, U.S. Patent No. 7,535,890 (filed December 18, 2003, issued May 19, 2009).
1002	File History for U.S. Patent No. 7,535,890
1003	Declaration of Leonard J. Forys, Ph.D.
1004	<i>Curriculum Vitae</i> of Leonard J. Forys, Ph.D.
1005	Vuori, U.S. Patent Application Publication No. 2002/0146097 (filed July 23, 2001, published October 10, 2002).
1006	Wu et al., U.S. Patent Application Publication No. 2002/0023131 (filed March 19, 2001, published February 21, 2002).
1007	Malik, U.S. Patent No. 7,123,695 (filed August 19, 2002, issued October 17, 2006).
1008	Väänänen, WO Patent Publication No. 02/17658 (filed August 20, 2001, published February 28, 2002).
1009	Deshpande, U.S. Patent Application Publication No. 2003/0046273 (filed August 28, 2001, published March 6, 2003).
1010	Daniell et al., U.S. Patent Application Publication No. 2004/0068545, (filed December 19, 2002, published April 8, 2004).
1011	Aoki et al., "The IMX Architecture Interoperability with America Online's Instant Messaging Services," June 15, 2000.
1012	Excerpts from Microsoft Computer Dictionary, 5th ed. (2002).
1013	Excerpt from Webster's New World College Dictionary, 4th ed., New York: MacMillan, 1999.
1014	Staack et al., WO Patent Publication No. 02/07396 (filed July 13, 2000, published January 24, 2002)

EXHIBIT	DESCRIPTION
1015	Abhuri, U.S. Patent Application Publication No. 2003/0147512 (filed February 1, 2002, published August 7, 2003).
1016	Old Version of AOL Instant Messenger 2.1 Download, retrieved from http://www.oldapps.com/aim.php?old_aim=4#screenshots .
1017	Clarke et. al., Experiments with packet switching of voice traffic, IEE Proceedings G - Electronic Circuits and Systems, V.130, N.4 , pp. 105-113 (August 1983).
1018	Sharma, VoP (voice over packet), IEEE Potentials, V. 21, N. 4, October/November 2002, pp. 14-17.
1019	Schuh et al., WO Patent Publication No. 2003/024027 (filed August 21, 2002, published March 20, 2003).
1020	Lotito et al., U.S. Patent No. 4,625,081 (filed November 30, 1982, issued November 25, 1986).
1021	Pershan, U.S. Patent No. 5,260,986 (filed April 23, 1991, issued November 9, 1993).
1022	Hogan et al., U.S. Patent No. 5,619,554 (filed June 8, 1994, issued April 8, 1997).
1023	International Telecommunication Union, General Aspects of Digital Transmission Systems, Terminal Equipments, Pulse Code Modulation (PCM) of Voice Frequencies, ITU-T Recommendation G.711., pp. 1-10 (ITU 1993).
1024	Oouchi et al., Study on Appropriate Voice Data Length of IP Packets for VoIP Network Adjustment, Proceedings of the IEEE Global Telecommunications Conference (GLOBECOM) 2002, V. 2, Taipei, Taiwan, 2002, pp. 1618–1622.
1025	Locascio, U.S. Patent No. 6,603,757 (filed April 14, 1999, issued August 5, 2003).

EXHIBIT	DESCRIPTION
1026	Peersman et al., The Global System for Mobile Communications Short Message Service, IEEE Personal Communications (June 2000).
1027	SMPP v3.4 Protocol Implementation guide for GSM / UMTS (May 30, 2002).
1028	Webster's New World Dictionary and Thesaurus, 2nd ed. (2002).
1029	Supplemental Declaration of Leonard J. Forys, Ph.D.
1030	Deposition Transcript of William C. Easttom, II

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