

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

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

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Case IPR2017-00222<sup>1</sup>  
Patent 8,243,723

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

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<sup>1</sup> Facebook, Inc. and WhatsApp, Inc., who filed a petition in IPR2017-01635, have been joined as petitioners in this proceeding.

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II. The term “list” means a list of “*one or more* nodes.” .....2

III. Claim 1 is unpatentable under 35 U.S.C. § 103 as being obvious over Vuori. .5

    A. Vuori teaches or suggests “transmitting a signal to a client including a list of the recorded connectivity status for each of the nodes in the sub-set corresponding to the client.” (Claims 1–7).....5

        1. Vuori’s SVM watcher *is* user-facing, therefore Vuori teaches or suggests “transmitting a signal to a client including a list of the recorded connectivity status.” .....5

        2. Even if “list” requires connectivity status of more than one node – Vuori still teaches the “transmitting” feature.....11

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VI. Conclusion.....22

**PETITIONER'S UPDATED EXHIBIT LIST**

<b>Exhibit</b>	<b>Description</b>
<b>1001</b>	Rojas, U.S. Patent No. 8,243,723 (earliest priority date December 18, 2003; filed March 4, 2009; issued August 14, 2012).
<b>1002</b>	File History for U.S. Patent No. 8,243,723.
<b>1003</b>	Declaration of Leonard J. Forys, Ph.D.
<b>1004</b>	<i>Curriculum Vitae</i> of Leonard J. Forys, Ph.D.
<b>1005</b>	Vuori, U.S. Patent Application Publication No. 2002/0146097 (filed July 23, 2001, published October 10, 2002).
<b>1006</b>	SMSS, Universal Mobile Telecommunications System (UTMS); Technical realization of the Short Message Service (SMS) (3G TS 23.040 version 3.5.0 Release 1999) (published on August 16, 2000).
<b>1007</b>	Holtzberg, U.S. Patent No. 6,625,261 (filed December 20, 2000, issued September 23, 2003).
<b>1008</b>	Väänänen, U.S. Patent No. 7,218,919 (filed August 8, 2001, issued May 15, 2007).
<b>1009</b>	Dahod et al., U.S. Patent Application Publication No. 2004/0022208 (filed on August 1, 2002, published February 5, 2004).
<b>1010</b>	Hogan et al., U.S. Patent No. 5,619,554 (filed June 8, 1994, issued April 8, 1997).
<b>1011</b>	Logan et al., U.S. Patent No. 5,732,216 (filed October 2, 1996, issued March 24, 1998).
<b>1012</b>	Peersman et al., The Global System for Mobile Communications Short Message Service, IEEE Personal Communications (June 2000).
<b>1013</b>	SMS Forum, SMPP v3.4 Protocol Implementation guide for GSM / UMTS, Version 1.0 (May 30, 2002).

<b>Exhibit</b>	<b>Description</b>
<b>1014</b>	Clarke et al., Experiments with packet switching of voice traffic, IEE Proceedings G - Electronic Circuits and Systems, Vol.130, Pt. G, No. 4, pp. 105-13 (August 1983).
<b>1015</b>	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.
<b>1016</b>	Lotito et al., U.S. Patent No. 4,625,081 (filed November 30, 1982, issued November 25, 1986).
<b>1017</b>	Pershan, U.S. Patent No. 5,260,986 (filed April 23, 1991, issued November 9, 1993).
<b>1018</b>	Old Version of AOL Instant Messenger 2.1 Download, retrieved from <a href="http://www.oldapps.com/aim.php?old_aim=4#screenshots">http://www.oldapps.com/aim.php?old_aim=4#screenshots</a> .
<b>1019</b>	Malik, Patent Publication No. 2003/0219104 (filed August 19, 2002, published November 27, 2003).
<b>1020</b>	Staack et al., WO Patent Publication No. 02/07396 (filed July 13, 2000, published January 24, 2002).
<b>1021</b>	Lerner et al., U.S. Patent No. 6,192,395 (filed December 17, 1999, issued February 20, 2001).
<b>1022</b>	Stubbs, WO Patent Publication No. 99/63773 (filed June 3, 1999, published December 9, 1999).
<b>1023</b>	Abhuri, U.S. Patent Application Publication No. 2003/0147512 (filed on February 1, 2002, published August 7, 2003).
<b>1024</b>	File History for U.S. Patent No. 7,535,890.

<b>Exhibit</b>	<b>Description</b>
<b>1025</b>	Day et al., A Model for Presence and Instant Messaging, Network Working Group, RFC 2778, pp. 1-17 (February 2000).
<b>1026</b>	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).
<b>1027</b>	Gayomali, C., "The text message turns 20: A brief history of SMS," <i>The Week</i> , December 3, 2012, retrieved from <a href="http://www.theweek.com/articles/469869/text-message-turns-20-brief-history-sms">http://www.theweek.com/articles/469869/text-message-turns-20-brief-history-sms</a> .
<b>1028</b>	Supplemental Declaration of Leonard J. Forys, Ph.D.
<b>1029</b>	Deposition Transcript of William C. Easttom, II

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