UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS, INC., BROCADE COMMUNICATIONS SYS., INC., AND RUCKUS WIRELESS, INC. Petitioner

v.

MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC Patent Owner

Case IPR2017-00640 Patent 5,659,891

PATENT OWNER MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC'S PRELIMINARY RESPONSE

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		2.	The '891 Patent has expired so the <i>Phillips</i> standard governs.	5
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		1.	Claims 1 and 3 – Same Location Limitation – The limitation of transmitting the plurality of paging carriers or at least two paging carriers "from the same location" means that "the multiple paging carriers emanate from the same location or antenna."	
		2.	Claim 5 – Independent Carrier Reception Limitation – The limitation of "a plurality of mobile receiving units independently receiving one of said plurality of carriers means "a mobile receiving unit is capable of receiving one carrier of the plurality of carriers independent from the other carriers of the plurality of carriers."	
		3.	Claims 2 and 4 – adjacent [carriers/subchannels] overlap with each other.	
		4.	Claims 1, 3, and 5 – Asymmetric Condition Limitation - This limitation means that "the frequency difference between the center frequency of the outer most of said	_



		carriers and the band edge of the mask defining said channel is more than half the frequency difference between the center frequencies of each adjacent carrier where the mask is defined relative to the center frequencies of the unmodulated carriers."	14	
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	В.	MTel Petition in view of '960 Publication does not teach or suggest all the claim limitations of Claim 5, so Claim 5 is not rendered obvious		
		1.	Neither <i>MTel Petition</i> nor '960 Publication teaches or suggests the Independent Carrier Reception Limitation of Claim 5, so Claim 5 is not rendered obvious	41
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