

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

UNILOC LUXEMBOURG, S.A.
Patent Owner

U.S. Patent No. 8,724,622

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,724,622
(PETITION 1 OF 2)**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8.....	1
A.	Real Party-in-Interest	1
B.	Related Matters.....	1
C.	Counsel and Service Information.....	5
III.	PAYMENT OF FEES	6
IV.	GROUND FOR STANDING.....	6
V.	PRECISE RELIEF REQUESTED	6
VI.	LEVEL OF ORDINARY SKILL IN THE ART	8
VII.	CLAIM CONSTRUCTION	8
VIII.	OVERVIEW OF THE '622 PATENT AND PRIOR ART, AND DETAILED EXPLANATION OF UNPATENTABILITY	9
A.	Ground 1 – <i>Griffin</i> and <i>Zydney</i> Render Obvious Claims 3, 4, 6- 8, 10, 11, 13, 18, 21-23, 27, 32, 34, 35, 38, and 39.....	9
1.	Claim 3	9
2.	Claim 4.....	30
3.	Claim 6.....	35
4.	Claim 7	37
5.	Claim 8.....	41
6.	Claim 10.....	43
7.	Claim 11	48
8.	Claim 13.....	54
9.	Claim 18.....	56
10.	Claim 21	58
11.	Claim 22.....	58
12.	Claim 23.....	60
13.	Claim 27	61
14.	Claim 32.....	67

15.	Claim 34.....	67
16.	Claim 35.....	70
17.	Claim 38.....	70
18.	Claim 39.....	71
B.	Ground 2 – <i>Griffin, Zydney, and Aravamudan</i> Render Obvious	
	Claim 12.....	72
	1. Claim 12.....	72
C.	Ground 3 – <i>Griffin, Zydney, and Vuori</i> Render Obvious Claim	
	11.....	76
	1. Claim 11.....	76
IX.	CONCLUSION.....	78

TABLE OF AUTHORITIES

	Page(s)
Federal Cases	
<i>Ariosa Diagnostics v. Verinata Health, Inc.</i> , 805 F.3d 1359 (Fed. Cir. 2015)	7
<i>KSR Int’l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	<i>passim</i>
<i>Toyota Motor Corp. v. Cellport Sys., Inc.</i> , IPR2015-00633, Paper No. 11 (Aug. 14, 2015)	9
Regulations	
37 C.F.R. § 42.8	1
37 C.F.R. § 42.100(b)	8

LIST OF EXHIBITS¹

No.	Description
1001	U.S. Patent No. 8,724,622
1002	Declaration of Dr. Zygmunt J. Haas
1003	Curriculum Vitae of Dr. Zygmunt J. Haas
1004	File History of U.S. Patent Application No. 13/546,673, which issued as U.S. Patent No. 8,724,622
1005	U.S. Patent No. 8,150,922 (“Griffin”)
1006	International Published Application No. WO01/11824A2 (“Zydney”)
1007	RESERVED
1008	WO 02/17650A1
1009	U.S. Patent No. 6,301,609 (“Aravamudan”)
1010 - 1014	RESERVED
1015	U.S. Patent Publication No. 2002/0146097 (“Vuori”)
1016 - 1018	RESERVED
1019	File History of U.S. Patent Application No. 12/398,063, which issued as U.S. Patent No. 8,243,723
1020	U.S. Patent No. 8,243,723
1021	File History of U.S. Patent Application No. 10/740,030, which issued as U.S. Patent No. 7,535,890
1022	U.S. Patent No. 7,535,890

¹ Citations to non-patent publications are to the original page numbers of the publication, and citations to U.S. patents are to column:line number of the patents.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.