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

IPR2017-1798
PATENT 8,724,622

PATENT OWNER RESPONSE TO PETITION
PURSUANT TO 37 C.F.R. §42.120

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C. Petitioner fails to prove that the proposed *Griffin-Zydney* combination renders obvious "a communication platform system maintaining connection information for each of the plurality of instant voice message client systems indicating whether there is a current connection to each of the plurality of instant voice message client systems" (claim 3) 23
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I. Neither *Griffin* plus *Zydney* nor *Clark* Disclose a File Manager System Storing, Deleting and Retrieving the Instant Voice Messages. 48

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List of Exhibits

Exhibit No.	Description
2001	Declaration of William C. Easttom II
2002	U.S. Pat. No. 7,372,826 (*Dahod*)
2003	U.S. Pat. App. Pub. No 2004/0128356 (*Bernstein*)
2004	Invalidity Contentions Submitted on December 16, 2016 in the underlying consolidated case of *Uniloc USA, Inc. v. Samsung Electronic America's, Inc*., Case No. 2:16-cv-642

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I. INTRODUCTION

Uniloc Luxembourg S.A. (the "Patent Owner") submits this Patent Owner's Response to Petition IPR2017-1798 for Inter Partes Review ("Pet." or "Petition") of United States Patent No. 8,724,622 B2, System and Method for Instant VoIP Messaging, ("the '622 Patent" or "EX1001") filed by Samsung Electronics America, Inc. ("Petitioner").

Petitioner argues that Claims 14-17, 19, 24-26, 28-31, and would have been rendered obvious to a person having ordinary skill in the art (a "POSITA") in 2003 in view of a user interface patent, U.S. Pat. No. 8,150,922 to Chris Michael *Griffin* et al. ("*Griffin*," EX1005) and International Pat. App. Pub. No. WO 01/11824 A2 to Herbert *Zydney* et al. ("*Zydney*," EX1006) in further view of U.S. Patent No. 6,725,228 ("*Clark*") (Ex. 1007), International Patent Application No. WO 02/17650A1 ("*Vaananen*") (Ex. 1008) and/or U.S. Patent Application Publication No. 2003/0018726A1 ("*Low*") (Ex. 1010).

The Board should deny IPR2017-1798 in its entirety because Petitioner fails to satisfy the All Elements Rule. Instead, Petitioner impermissibly attempts to fill in missing limitations, at least in part, by offering claim interpretations that are expressly proscribed by the unambiguous claim language. The user interface patent to *Griffin* does not describe or enable instant voice messaging. In addition, the references cannot and should not be combined as the Petition suggests.

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