

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

Case: IPR2017-01798
U.S. Patent No. 8,724,622

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I. INTRODUCTION 1

II. CLAIM CONSTRUCTION 1

 A. “Instant Voice Message” (All Challenged Claims) 1

 1. The IVM Is a Message Containing Digitized Speech 1

 2. “Instant” Means Capable of Being Transmitted in Real Time to a Recipient Device..... 3

 B. “Network Interface” (Claims 3 and 24) 5

III. THE CHALLENGED CLAIMS ARE OBVIOUS OVER THE PRIOR ART 7

 A. The Combination of *Griffin* and *Zydney* Discloses the Claimed “Object Field” 7

 B. *Griffin* Alone or in Combination with *Zydney* Discloses the Claimed “Network Interface” 9

 C. The *Griffin-Zydney* Combination Discloses “Connection Information” Indicating Whether There Is a “Current Connection” 11

 D. *Low* Discloses “Connection Object Messages” 13

 E. *Zydney* Does Not Teach Away From the *Griffin-Zydney-Low* Combination 14

 F. *Clark* Teaches a Message Database Containing a Database Record With Both a Unique Identifier and the Message Itself 15

 G. *Clark* Does Not Teach Away From the *Griffin-Zydney-Clark* Combination 16

 H. *Zydney* Does Not Teach Away From the *Griffin-Zydney-Clark* Combination 17

I. The *Griffin-Zydney-Clark* Combination Discloses a File Manager System That Can Store, Delete, and Retrieve Instant Voice Messages.....18

J. A POSA Would Have Been Motivated to Combine *Griffin* and *Zydney* for the Reasons Explained in the Petition.....19

1. PO’s Arguments Regarding *Griffin*’s Text-Only Buddies Are Misplaced20

2. *Griffin* Is Compatible With *Zydney*21

3. Messages Would Not Be Lost in the Combined System22

4. *Griffin*’s and *Zydney*’s Teachings Related to Availability are Compatible23

IV. CONCLUSION.....25

TABLE OF AUTHORITIES

Page(s)

Cases

Allied Erecting and Dismantling Co., Inc. v. Genesis Attachments,
825 F.3d 1373 (Fed. Cir. 2016)23

In re Bond,
910 F.2d 831 (Fed. Cir. 1990)12

LIST OF EXHIBITS¹

No.	Description	Previously Submitted
1001	U.S. Patent No. 8,724,622	X
1002	Declaration of Dr. Zygmunt J. Haas	X
1003	Curriculum Vitae of Dr. Zygmunt J. Haas	X
1004	File History of U.S. Patent Application No. 13/546,673, which issued as U.S. Patent No. 8,724,622	X
1005	U.S. Patent No. 8,150,922 (“ <i>Griffin</i> ”)	X
1006	International Published Application No. WO01/11824A2 (“ <i>Zydney</i> ”)	X
1007	U.S. Patent No. 6,725,228 (“ <i>Clark</i> ”)	X
1008	WO 02/17650A1 (“ <i>Vaananen</i> ”)	X
1009	RESERVED	
1010	U.S. Patent Publication No. 2003/0018726A1 (“ <i>Low</i> ”)	X
1011 - 1018	RESERVED	
1019	File History of U.S. Patent Application No. 12/398,063, which issued as U.S. Patent No. 8,243,723	X
1020	U.S. Patent No. 8,243,723	X
1021	File History of U.S. Patent Application No. 10/740,030, which issued as U.S. Patent No. 7,535,890	X
1022	U.S. Patent No. 7,535,890	X

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.