

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 PRELIMINARY RESPONSE TO PETITION
PURSUANT TO 37 C.F.R. §42.107(a)**

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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 (<i>Dahod</i>)
2003	U.S. Pat. App. Pub. No 2004/0128356 (<i>Bernstein</i>)
2004	Invalidity Contentions Submitted on December 16, 2016 in the underlying consolidated case of <i>Uniloc USA, Inc. v. Samsung Electronic America's, Inc.</i> , Case No. 2:16-cv-642

I. INTRODUCTION

Uniloc Luxembourg S.A. (the “Patent Owner”) submits this Owner’s Preliminary 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”).

As further explained below, the Board should deny IPR2017-1798 in its entirety for numerous reasons.

II. RELATED MATTERS

The ’622 Patent is in a family of patents including United States Patent Nos. 7,535,890 (“the ’890 Patent”); 8,243,723 (“the ’723 Patent”); 8,199,747 (“the ’747 Patent”); and 8,995,433 (“the ’433 Patent”).¹ The diagram below how this family of patents is interrelated.

¹ All five related patents derive from United States Patent Application No. 10/740,030 and are referred to collectively as members of the ’622 Patent’s “family.”

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