UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

UNILOC LUXEMBOURG, S.A.¹
Patent Owner

Case: IPR2017-01801 U.S. Patent No. 8,995,433

JOINT FILING OF OBJECTIONS TO DEMONSTRATIVES

¹ Uniloc's updated mandatory notice filed on August 27, 2018, indicates that the owner of U.S. Patent No. 8,995,433 is now Uniloc 2017 LLC. (Paper 18.)



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Samsung's Objections to Demonstratives

The following slides belatedly attempt to introduce new arguments and evidence: 5 ("'message content 406' is not an 'object field," "three distinct elements," "only description of message content 406," graphics), 7 (graphics), 10 (Ex. 2001 at ¶¶ 40-46, 48 are not relied upon), 11 (Ex. 2007 not an exhibit or relied upon in IPR2017-01797), 12 ("relies solely on Griffin"), 16 ("relies exclusively on Low's description" of connect/disconnect), 17 ("At most…"), 22 (referenced proceedings not discussed), 23 (IPR2017-02085 not discussed), 25 (same), 26 (same), 27 (discussion of 26 IPRs), 32 (Ex. 2001 at ¶ 53 not relied upon for "device-specific information" argument), 34 ("This is true regardless…"; "The Board further noted…"), 40 (IPR2017-02085 not discussed), 54 (argument regarding "queuing"), 55 (Ex. 2001 at ¶ 34 not relied on for this limitation), 57 ("Petitioner's reliance…"), 58 (arguments and citations related to Ex. 2004).

Petitioner requests a pre-hearing call or additional time at the hearing to address these issues.

Uniloc's Objections to Demonstratives

- 1. Slides 12–24 rely on new claim construction argument presented for the first time in Petitioner's Reply that is outside the proper scope of the Reply. See, e.g., IPR2017-01799 at 6 n.4.
- 2. Slides 31–33 rely on new argument concerning the "attaching" limitations, presented for the first time in Petitioner's Reply, that is outside the proper scope of the Reply.
- 3. Slides 36–39 rely on new argument concerning the "controlling" limitations, presented for the first time in Petitioner's Reply, that is outside the proper scope of the Reply.
- 4. Slides 18, 24, 31–32, 40, 63, 74, 80, 88, 97, and 101 purport to rely on selected excerpts from cross-examination testimony that is outside the scope of Doctor Easttom's declaration and that violate the rule of completeness.
- 5. Petitioner's slides fail to properly refer to Patent Owner's expert by his proper title "Doctor Easttom."

Patent Owner submits that it is unnecessary to have a pre-hearing call or additional time at the hearing to address these issues.



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Respectfully submitted,

Dated: October 23, 2018 By: /Naveen Modi/

Naveen Modi (Reg. No. 46,224)

Counsel for Petitioner



Case: IPR2017-01801 U.S. Patent No. 8,995,433

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on the counsel for Patent Owner a true and correct copy of the foregoing Joint Filing of Objections To Demonstratives by electronic means on October 23, 2018 at the following address of record:

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