

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HUAWEI DEVICE CO., LTD AND LG ELECTRONICS, INC.,  
Petitioners

v.

UNILOC LUXEMBOURG S.A.,  
Patent Owner

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IPR2017-02090  
PATENT 8,724,622

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

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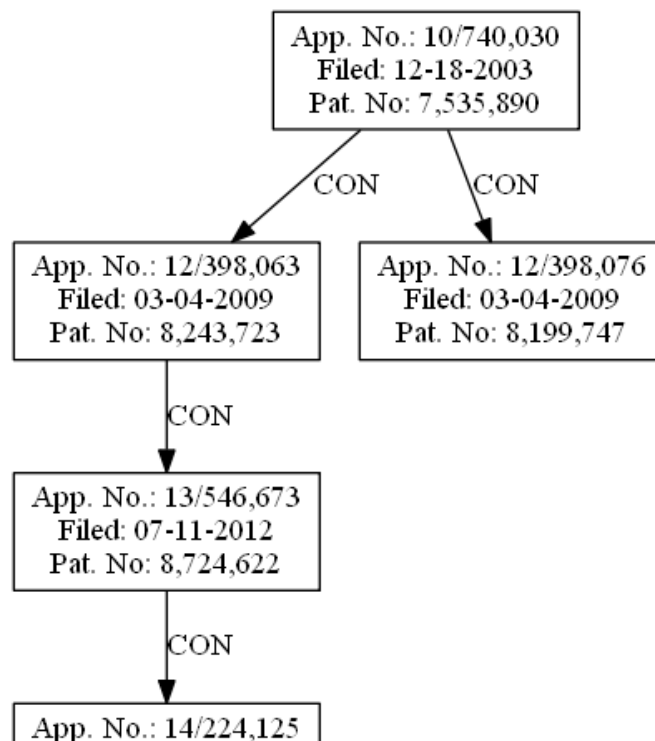
<b>Exhibit No.</b>	<b>Description</b>
<b>2001</b>	Declaration of William C. Easttom II
<b>2002</b>	Invalidity Contentions Submitted on March 28, 2017 in the underlying consolidated case of <i>Uniloc USA, Inc. v. Samsung Electronic America's, Inc.</i> , Case No. 2:16-cv-642
<b>2003</b>	Invalidity Contentions 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
<b>2004</b>	Microsoft TechNet, Using HTTP Compression

## I. INTRODUCTION

Pursuant to 35 U.S.C. § 313 and 37 C.F.R. § 42.107(a), Uniloc Luxembourg S.A. (“Patent Owner”) submits this Preliminary Response to the Petition for *Inter Partes* Review (“the Petition”) of U.S. Patent No. 8,724,622 (“the ’622 patent”) filed by Huawei and LG Electronics (“LGE”) (collectively, “Petitioners”). Petitioners move to join the proceeding in IPR2017-1667. The Board has not yet rendered a decision on whether the original petition filed in IPR2017-1667 meets the procedural and substantive requirements. It does not. Given the instant Petition is purportedly a carbon copy, it suffers from the same fatal defects.

## II. PETITIONERS DO NOT SATISFY THE MANDATORY NOTICE REQUIREMENTS

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”), as shown in the diagram below.



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