

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.

Petitioner

- vs. -

FALL LINE PATENTS, LLC

Patent Owner

IPR2018-00043

U.S. Patent 9,454,748

PETITIONER'S SUBMISSION PURSUANT TO ORDER –

MOTIONS FOR PROTECTIVE ORDER AND TO SEAL

(PAPER 33)

In view of the Board's deferral of rulings on the parties' motions to seal (Papers 29 and 32), and pursuant to the Board's instructions in the Order – Motions for Protective Order and to Seal (Paper 33), Petitioner Unified Patents Inc. herewith files redacted, public versions of Paper 30, Paper 31, and Exhibit 2009. Neither Paper 30, nor Paper 31, nor Exhibit 2009 need be sealed in its entirety.

Petitioner respectfully requests that Exhibit 1028 be unsealed, as it does not contain sensitive, non-public information.

Petitioner understands that Patent Owner wishes to file a responsive paper, as Patent Owner has indicated that it does not agree with Petitioner's redactions to Paper 30, Paper 31, and Exhibit 2009.

Respectfully submitted,

April 18, 2019

/David W. O'Brien/
David W. O'Brien
Counsel for Petitioner
Registration No. 40,107
HAYNES AND BOONE, LLP

PETITIONER'S EXHIBIT LIST

April 18, 2019

EX1001	U.S. Patent 9,454,748 to J. David Payne
EX1002	Prosecution File History of U.S. Patent 9,454,748 (“748 PH”)
EX1003	Prosecution File History of U.S. Patent 7,822,816 (“816 PH”)
EX1004	U.S. Patent 7,822,816 to J. David Payne
EX1005	Declaration of A.L. Narasimha Reddy
EX1006	U.S. Patent 6,154,745 to Kari et al. (“Kari”)
EX1007	HTML 4 Unleashed by Darnell et al. (“Darnell”)
EX1008	Declaration of David Bader
EX1009	U.S. Patent 6,380,928 to Todd (“Todd”)
EX1010	U.S. Patent 6,381,603 to Chan et al. (“Chan”)
EX1011	Memorandum Opinion and Order, <i>Macrosolve, Inc. v. Antenna Software, Inc. et al.</i> , 6:11-cv-287 MHS-KNM (E.D. Tex. Jan. 21, 2014) (“816 Markman Order”)
EX1012	Institution Decision, IPR2014-00140 (“816 Institution”)
EX1013	Microsoft Computer Dictionary, 5 th ed. (excerpt)
EX1014	U.S. Patent 6,222,483 to Twitchell et al. (“Twitchell”)
EX1015	U.S. Patent 5,043,736 to Darnell et al. (“Darnell ’736”)
EX1016	Dictionary of Computer Science (excerpt)
EX1017	Dictionary of Scientific and Technical Terms, 4 th ed. (excerpt)
EX1018	Goran M. Djuknic & Robert E. Richton, <i>Geolocation and Assisted GPS</i> , IEEE Computer, Vol. 34 no. 2, 123-125 (Feb. 2001)

Petitioner's Submission Pursuant to Paper 33
IPR2018-00043 (U.S. Patent 9,454,748)

EX1019	Robert S. Anthony, <i>The Ultimate Personal Peripheral</i> , PC Magazine, Vol. 17 no. 5, 100-124 (Mar. 10, 1998)
EX1020	Johan Hjelm, <i>Creating Location Services for the Wireless Web: Professional Developer's Guide</i> (2002).
EX1021	Reply Declaration of A.L. Narasimha Reddy ("Reddy Reply Decl.")
EX1022	Ira Kalb, <i>Wireless in Europe</i> , May 2001, available at https://web.archive.org/web/20011215142247/http://www-106.ibm.com/developerworks/library/wi-eur/index.html , last retrieved August 16, 2018 ("Kalb").
EX1023	HTML 4.0 Guidelines for Mobile Access, W3C Note – 15 March 1999, https://web.archive.org/web/20000823062148/http://www.w3.org:80/TR/1999/NOTE-html40-mobile-19990315/ , last retrieved September 6, 2018 ("HTML 4.0 Note").
EX1024	Timothy Berners-Lee, Hypertext Markup Language – 2.0, RFC 1866, https://tools.ietf.org/pdf/rfc1866.pdf , last retrieved September 6, 2018 ("RFC 1866").
EX1025	Reddy Declaration in IPR2014-00140.
EX1026	Declaration of Kevin Jakel
EX1027	Unified Patents Voluntary Interrogatories
EX1028	Jakel Deposition Transcript Errata Sheet
EX1029	Redacted Version of Exhibit 2009 (Jakel Deposition Transcript)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Unified Patents, Inc. § Petition for *Inter Partes* Review
Petitioner §
 § IPR2018-00043
 § U.S. Patent No. 9,454,748
 §

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service April 18, 2019

Manner of service Electronic Service by E-Mail

Documents served 1) Petitioner's Submission Pursuant to Order – Motions for Protective Order and to Seal (Paper 33)
 2) Patent Owner's RPI Observations (Public Version – Paper 30)
 3) Petitioner's Response to Patent Owner's Observations (Public Version – Paper 31)
 4) Exhibit 1029 (Redacted Exhibit 2009)

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