

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

Sony Corporation,
Petitioner,

v.

One-E-Way, Inc.
Patent Owner.

IPR2018-00217

Patent No. 7,865,258

Issue Date: January 4, 2011

Title: Wireless Digital Audio System

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,865,258 UNDER
35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 ET SEQ.**

TABLE OF CONTENTS

TABLE OF AUTHORITIESvi

APPENDIX OF EXHIBITS.....vii

I. COMPLIANCE WITH PETITION REQUIREMENTS 1

 A. Notice of Real Parties in Interest1

 B. Notice of Related Matters.....1

 C. Notice of Lead and Backup Counsel and Service Information.....2

 D. Grounds for Standing2

 E. Statement of Precise Relief Requested2

II. FACTUAL BACKGROUND3

 A. Brief Description of the '258 Patent.....3

 B. Prosecution History of the '258 Patent6

 C. State of the Prior Art.....7

 1. Haartsen’s 1998 Paper7

 2. Patent No. 6,563,892 to Haartsen8

 3. The 2000 Haartsen Paper10

 4. The Giannakis Paper10

III. THE CHALLENGED '258 PATENT11

 A. Person of Ordinary Skill in the Art.....11

 B. Claim Constructions11

IV. SPECIFIC GROUNDS FOR PETITION13

 A. Ground 1: The '892 Reference Combined with the Giannakis
 Paper Makes Obvious Claims 3, 4, 8, 10, and 11 of the '258 Patent.....13

 1. The '892 Reference Is Prior Art to the '258 Patent.....13

 2. The Giannakis Paper Is Prior Art to the '258 Patent14

 3. Motivation to Combine.....14

 4. Claims 3, 8, and 1116

- a. Claim 3: A portable wireless digital audio transmitter system for digital transmission of an original audio signal representation from a portable audio source to a portable digital audio headphone receiver, said portable wireless digital audio system comprising:16
- b. Claim 3: a digital audio transmitter operatively coupled to said portable audio source and transmitting a unique user code bit sequence with said original audio signal representation in packet format, wherein said digital audio transmitter operatively coupled to said audio source is capable of mobile operation, said digital audio transmitter comprising:17
- c. Claim 3: an encoder operative to encode said original audio signal representation to reduce intersymbol interference18
- d. Claim 3: a digital modulator module configured for independent CDMA communication operation;19
- e. Claim 3: said digital audio transmitter configured for direct digital wireless communication with said portable digital audio headphone receiver, said portable digital audio headphone receiver comprising:20
- f. Claim 3: a direct conversion module configured to capture packets embedded in the received spread spectrum signal, the captured packets corresponding to the unique user code bit sequence;21
- g. Claim 3: a digital demodulator configured for independent CDMA communication operation22
- h. Claim 3: a decoder operative to decode the applied reduced intersymbol interference coding of said original audio signal representation23
- i. Claim 3: a digital-to-analog converter (DAC) generating an audio output of said original audio signal representation; and24

j. Claim 3: a module adapted to reproduce said generated audio output, said audio having been wirelessly transmitted from said portable audio source and reproduced virtually free from interference.....24

5. Claims 4 and 1025

a. Claim 4: A portable wireless digital audio system for digital transmission of an original audio signal representation from a portable audio source to a portable digital audio headphone receiver, said portable wireless digital audio system comprising:26

b. Claim 4: a digital audio transmitter operatively coupled to said portable audio source and transmitting a unique user code bit sequence with said original audio signal representation in packet format, wherein said digital audio transmitter operatively coupled to said audio source is capable of mobile operation, said digital audio transmitter comprising:26

c. Claim 4: an encoder operative to encode said original audio signal representation to reduce intersymbol interference.....27

d. Claim 4: a channel encoder and interleaver to reduce transmission errors.....28

e. Claim 4: a differential phase shift keying (DPSK) modulator being configured for independent code division multiple access (CDMA) communication operation;.....29

f. Claim 4: said digital audio transmitter configured for direct digital wireless communication with said portable digital audio headphone receiver, said portable digital audio headphone receiver comprising:30

g. Claim 4: a direct conversion module configured to capture packets embedded in the received spread spectrum signal, the captured packets corresponding to the unique user code bit sequence30

h. Claim 4: a digital demodulator configured for independent CDMA communication operation32

i. Claim 4: a viterbi decoder and de-interleaver generating a corresponding digital output33

j. Claim 4: a decoder operative to decode the applied reduced intersymbol interference coding of said original audio signal representation34

k. Claim 4: a digital-to-analog converter (DAC) generating an audio output of said original audio signal representation35

l. Claim 4: a module adapted to reproduce said generated audio output, said audio having been wirelessly transmitted from said portable audio source virtually free from interference from device transmitted signals operating in the portable wireless digital audio system spectrum.....35

V. CONCLUSION.....36

VI. APPENDIX: ABRIDGED CLAIM CHARTS38

CERTIFICATE OF SERVICE.....63

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.