UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner,

v.

UNILOC USA, INC. and
UNILOC LUXEMBOURG, S.A., Patent Owner

_____

PETITION FOR *INTER PARTES* REVIEW

OF

U.S. PATENT NO. 7,092,671

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I. INTRODUCTION

The purported invention of U.S. Patent No. 7,092,671 ("the '671 Patent," APPL-1001) is "an automated telephone dialing system" which enables a computer to automatically dial a telephone number stored in its memory by interacting with a telephone through wireless communications. However, as shown in this petition, such systems were well known to persons of ordinary skill in the art long before the priority date of the '671 Patent, and the evidence herein demonstrates that claims 1-7 and 9-15 are unpatentable under pre-AIA 35 U.S.C. § 103.

II. MANDATORY NOTICES

A. Real Party-in-Interest

The real party-in-interest is Apple Inc. ("Petitioner").

B. Related Matters

As of the filing date of this petition, the '671 Patent has been asserted in *Uniloc USA, Inc. v. Apple Inc.*, 2:17-cv-00457 (E.D. Tex. 2017) and *Uniloc USA, Inc. v. Samsung Electronics America, Inc.*, 2-17-cv-00562 (E.D. Tex. 2017).

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Please address all correspondence to lead and back-up counsel. Petitioner consents to electronic service via email.

III. GROUNDS FOR STANDING

Petitioner certifies that the '671 Patent is eligible for *inter partes* review and that Petitioner is not barred or estopped from requesting *inter partes* review challenging the patent claims on the grounds identified in this petition.

IV. THE '671 PATENT

The '671 Patent generally describes a system and method that enables a handheld device to "automatically dial a telephone number stored in its memory by interacting with a telephone." APPL-1001, 2:37-40; 4:11-23. As will be demonstrated in this petition, such systems and methods were known long before the filing of the '671 Patent.

A. State of the Art before the '671 Patent

1. Computer Autodialing Systems

Using computers to automate dialing on telephones was well known before the '671 Patent. Declaration of Nenad Medvidović, Ph.D. Under 37 C.F.R. § 1.68 (APPL-1003), ¶ 37. For example, U.S. Patent No. 6,084,949 to Yun ("Yun") (APPL-1005), filed more than three years before the priority date of the '671 Patent, described "[a]n automatic dialing method of a telephone system." APPL-

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