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

APPLE, INC.
Petitioner
v.
UNILOC LUXEMBOURG, S.A.
Patent Owner
IPR2018-00289
PATENT 8,872,646

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



Table of Contents

I.	INT	RODU	CTION	1
II.	THE	'646 F	PATENT	1
III.	LEV	EL OF	ORDINARY SKILL IN THE ART	2
IV.	LIKI	ELIHO	ER DOES NOT PROVE A REASONABLE OD OF UNPATENTABILITY FOR ANY GED CLAIM	2
	A.	Clain	n Construction	3
		1.	"glitch"	3
		2.	"a change in dominant axis"	5
		3.	"dominant axis logic to determine an idle sample value for a dominant axis of the mobile device based on the motion data"	6
		4.	"[the] dominant axis logic [further] to compare a difference between a current sample value along the dominant axis determined based on the motion of the device and the idle sample value of the dominant axis against a threshold value"	7
		5.	"computation logic to determine whether the motion caused a change in the dominant axis"	8
		6.	"power logic to wake up the device when the motion of the device indicates a change in the dominant axis of the device"	9
		7.	"power logic to move the device from the inactive state to an active state upon detection of a change in the dominant axis which is the axis experiencing the largest effect of gravity"	0
		8.	"long average logic to calculate an average of	



		accelerations over a sample period"12			
	9.	"device state logic to restore the device to a last active state"			
В.	The Petition's Allegations Of So-Called "Well-Known Accelerometer Techniques" Is Inapposite And Is Evidence Of The Petition's Failure To Show Reasonable Likelihood Of Unpatentability For Any Challenged Claim				
	1.	The Petition Provides Only Conclusory Speculation, Through Its Declarant, Regarding The Alleged Combination of Pasolini And Goldman			
	2.	The Petition Provides Only Conclusory Speculation, Through Its Declarant, Regarding The Alleged Combination of McMahan With Pasolini And Goldman			
	3.	The Petition Provides Only Conclusory Speculation, Through Its Declarant, Regarding The Alleged Combination of Mizell With Pasolini And Goldman			
	4.	The Petition Provides Only Conclusory Speculation, Through Its Declarant, Regarding The Alleged Combination of Park With Pasolini And Goldman			
C.	"Ren Data'	Prima Facie Obviousness for the "Glitches" and noving the One or More Glitches From the Motion "Limitations In All Independent Claims (Claims 1, and 20)			
	1.	No <i>Prima Facie</i> Obviousness for "verifying whether the motion data includes one or more glitches and removing the one or more glitches from the motion data" (Claim 1)			
	2.	No <i>Prima Facie</i> Obviousness for "a glitch			



			corrector to determine whether the motion data includes one or more glitches and removing the one or more glitches from the motion data" (Claim 13)	26	
		3.	No <i>Prima Facie</i> Obviousness for "a glitch corrector to determine whether the motion data includes one or more glitches and remove the one or more glitches from the motion data" (Claim 20)	26	
	D.		Petition Should Be Denied As To Challenged endent Claims 3, 5-11, And 14-18	27	
V.	THE	E CON	REME COURT IS CURRENTLY REVIEWING STITUTIONALITY OF INTER PARTES	27	
VI	CON	JCI IIS	SION	28	



Exhibit No.	Description
2001	Declaration of Dr. William C. Easttom



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