

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. and LG ELECTRONICS, INC.,¹
Petitioner,

v.

UNILOC 2017 LLC,
Patent Owner.

Case IPR2018-00361
Patent 6,216,158 B1

**PETITIONERS' CONSOLIDATED REPLY TO
PATENT OWNER'S RESPONSE**

¹ In IPR2018-01503, LG Electronics, Inc. filed a Petition and Motion for Joinder, which was granted, and therefore has been joined as a petitioner in this proceeding.

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A. Riggins discloses “*accessing a description of the service from a directory of services, the description of the service including at least a reference to program code for controlling the service*” (claim 1) 18

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I. INTRODUCTION

The Petition and supporting evidence demonstrate that claims 1-2, 6-9, 12, 14-15, and 20 of the '158 Patent are unpatentable over the combination of Jini-QS, Arnold, and McCandless and also over the combination of Riggins and Devarakonda. In its Response, Patent Owner attempts to avoid the evidence in the record with arguments that are either unsupported by the record or legally deficient.

For example, with respect to the Jini-based challenge, Patent Owner alleges that the Jini-QS article is not prior art because the '158 Patent has an earlier priority date. But Patent Owner fails to provide *any* supporting evidence for this claim. Patent Owner also contends that Jini-QS is allegedly not enabled, but it ignores the law: references in a § 103 combination are prior art for all they teach. And indeed, Jini-QS teaches the very thing sought to be protected by the '158 Patent—using a PalmPilot with Jini—and nothing in Patent Owner's Response undermines that fact.

Moreover, Patents Owner's arguments with respect to Riggins and Devarakonda similarly fail to overcome the actual teachings of the references. For example, Patent Owner argues that a POSITA would not have been motivated to utilize a web browser on Devarakonda's PDA because doing so would have been

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