

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

UNILOC LUXEMBOURG, S.A.,
Patent Owner

PETITION FOR *INTER PARTES* REVIEW

OF

U.S. PATENT NO. 6,622,018

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I. INTRODUCTION

U.S. Patent No. 6,622,018 (“the ’018 Patent”) is generally directed to controlling a plurality of different consumer devices with a palmtop computer over a wireless connection. In particular, the ’018 Patent seeks to cover the idea of discovering controllable devices with a broadcast message. The subject matter deemed novel by the Examiner during prosecution—“controlling remote device over wireless communication link by transmitting a command to the remote device”—however, was well known to persons of ordinary skill in the art before the earliest alleged priority date of the ’018 Patent.

For example, U.S. Patent No. 6,791,467 to Ben-Ze’ev achieves the same goal as the ’018 Patent—wirelessly controlling a variety of different consumer devices—in the same way—with a PalmPilot-based remote controller that broadcasts messages to discover nearby devices, displays icons corresponding to discovered devices, and transmits commands to the devices in response to user interactions with a touch-screen. In conjunction with Ben-Ze’ev, “The Complete Idiot’s Guide to PalmPilot” illustrates that the claimed manner of interacting with the palmtop computer—*e.g.*, via a stylus and input device—was standard functionality of the PalmPilot at the time. The dependent claims of the ’018 Patent merely recite additional well-known aspects of remotely controlling consumer devices, as illustrated by Ben-Ze’ev, Idiot’s Guide, and other references.

The evidence in this Petition demonstrates that claims 1-27 of the '018 Patent are unpatentable under pre-AIA 35 U.S.C. § 103. Accordingly, Apple Inc. (“Petitioner”) respectfully requests that claims 1-27 of the '018 Patent be held unpatentable and cancelled.

II. MANDATORY NOTICES

A. Real Party-in-Interest

The real party-in-interest is Apple Inc.

B. Related Matters

As of the filing date of this Petition, the '018 Patent has been asserted in:

- *Uniloc USA, Inc. et al. v. Logitech, Inc. et al.*, 3:17-cv-06733-JSC (N.D. Cal. 2017), ongoing;
- *Uniloc USA, Inc. et al. v. Wink Labs Inc.*, 1:17-cv-01656-GMS (D. Del. 2017), ongoing;
- *Uniloc USA, Inc. et al. v. Motorola Mobility, LLC*, 1:17-cv-01657-GMS (D. Del. 2017), ongoing;
- *Uniloc USA, et al. v. Peel Technologies, Inc.*, 1:17-cv-01552-UNA (D. Del. 2017), ongoing;
- *Uniloc USA, et al. v. Huawei Device USA, Inc.*, consolidated case no. 2:17-cv-00707-JRG (E.D. Tex. 2017), ongoing;
- *Uniloc USA, et al. v. HTC America, Inc.*, 2:17-cv-01558-JLR (W.D. Wash. 2017), ongoing;

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