

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioner

v.

UNILOC LUXEMBOURG, S.A.

Patent Owner

IPR2018-00395

PATENT 6,622,018

PATENT OWNER PRELIMINARY RESPONSE TO PETITION

PURSUANT TO 37 C.F.R. §42.107(a)

Table of Contents

I.	INTRODUCTION	1
II.	THE '018 PATENT	1
III.	RELATED PROCEEDINGS.....	3
IV.	THE PETITION SHOULD BE DENIED AS IMPERMISSIBLY REDUNDANT UNDER § 325(D)	4
V.	PETITIONER DOES NOT PROVE A REASONABLE LIKELIHOOD OF UNPATENTABILITY FOR ANY CHALLENGED CLAIM.....	6
A.	LEVEL OF ORDINARY SKILL IN THE ART.....	7
B.	CLAIM CONSTRUCTION	7
C.	THE PETITION FAILS TO SHOW A POSITA WOULD HAVE COMBINED <i>Leichiner</i> , AND <i>Idiot's Guide</i>	7
1.	The Petition's Reliance on "PalmRemote" Lacks The Required Analysis or Explanation Of How Or Why <i>Leichiner</i> , And <i>Idiot's Guide</i> Would Be Combined	9
2.	The <i>Idiot's Guide</i> Does Not Support Making The Proposed Combination By A POSITA	11
3.	Petitioner Provides Only Speculation Through Its Declarant To Support The Proposed Combination.....	15
D.	No <i>Prima Facie</i> Obviousness For "broadcasting a message, said message for locating remote devices within range of said transceiver"	16
VI.	THE SUPREME COURT IS CURRENTLY REVIEWING THE CONSTITUTIONALITY OF INTER PARTES REVIEW	19
VII.	CONCLUSION.....	20

List of Exhibits

Exhibit No.	Description
2001	Declaration of William C. Easttom

I. INTRODUCTION

Uniloc Luxembourg S.A. (the “Uniloc” or “Patent Owner”) submits this Preliminary Response to Petition IPR2018-00395 for *Inter Partes* Review (“Pet.” or “Petition”) of United States Patent No. 6,622,018 (“the ’018 patent” or “EX1001”) filed by Apple Inc. (“Petitioner”). The instant Petition is procedurally and substantively defective for at least the reasons set forth herein.

II. THE ’018 PATENT

The ’018 patent is titled “Portable Device Control Console With Wireless Connection.” The ’018 patent issued September 16, 2003 from U.S. Patent Application No. 09/558,413 filed April 24, 2000 and originally assigned to 3Com Corporation (3Com).

The inventors of the ’018 patent observed that remote control devices at the time had a number of shortcomings. For example, a separate remote control device may be required for each device to be controlled. In some instances, the separate remotes could be replaced with a universal remote control; however, universal remotes still had their shortcomings. EX1001, 1:31-36. Generally, universal remotes at the time often did not have the resources (e.g., memory and computational logic) to allow them to be used with all devices, or they might not be capable of controlling a new device. *Id.*, 1:37-40. In addition, in order to accommodate the variety of devices to be controlled, universal remotes usually had a multiplicity of buttons and thus could be difficult to use. *Id.*, 1:40-43.

According to the invention of the ’018 Patent, a system and method for controlling remote devices over a wireless connection is provided. In one

embodiment, a portable computer system having a transceiver is used to control compliant devices. *Id.*, 2:17-22. When it is necessary to locate and identify compliant devices, portable computer system transmits a broadcast message that is received by compliant remote devices. *Id.*, 8:32-35. Each of the remote devices is manifested on a display device of the portable computer system and one of the devices is selected using, for example, a stylus element. *Id.*, 2:27-30. The stylus element can also be used to specify commands for controlling the remote device. A position where the stylus element makes contact with a surface of the display device of the portable computer system is registered. The particular position where the stylus element makes contact with the display device is translated into a particular command for controlling the remote device. The command is then transmitted to the remote device over the wireless connection. *Id.*, 2:31-39. Additionally, a rendering of the remote device or of a mechanism that can be used to control the remote device is displayed on the display device. The contact of the stylus element with a position in the rendering is translated into a particular command for controlling the remote device. *Id.*, 2:40-49. Alternatively, a menu of commands for controlling the remote device is displayed on the display device. The contact of the stylus element with a position in the menu is translated into a particular command for controlling the remote device. *Id.* Furthermore, the movement of the stylus element over the surface of an input device is recognized and translated into a particular command for controlling the remote device. By moving the stylus element over the surface of the input device, motion is imparted to the rendering on the display device of the remote device or the mechanism for controlling the remote device. *Id.*, 2:50-56.

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