

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

UNILOC LUXEMBOURG, S.A.,
Patent Owner.

Case IPR2018-00395
Patent 6,622,018 B1

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I. INTRODUCTION

Patent Owner's Response demonstrates that there are only two issues in dispute: (i) whether the Leichiner reference teaches the "broadcasting" limitation recited in the independent claims of the '018 Patent, and (ii) whether the Petition provides sufficient motivation to combine the Leichiner and the Idiot's Guide references.

With respect to the first issue, there is no dispute over the plain and ordinary meaning of "broadcasting"—sending a singular message receivable by multiple devices. In that regard, Leichiner explicitly teaches that its remote controller sends a singular polling message to multiple devices *at the same time*. See APPL-1027, ¶¶ [0022], [0012] (explaining that a "polling message" is utilized to "conduct polling to a number of the controlled devices at the same time."). Leichiner further teaches that the purpose of the polling is to detect the presence of *new devices* when entering a room—precisely the same purpose as the claimed broadcast message. Patent Owner attempts to avoid this explicit disclosure by relying on an out-of-context definition of "polling" that requires sequential "round robin" interrogation. This definition, however, contradicts Leichiner's explicit statement that its devices are polled "at the same time," and ignores evidence that a "polling message" could, in fact, be broadcast.

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