

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 (“POSITA”) before the earliest alleged priority date of the ’018 Patent.

For example, Japanese Pub. No. JPH06319177 to Leichiner achieves the same goal as the ’018 Patent—wirelessly controlling a variety of different consumer devices—in the same way—with a palmtop computer-based remote controller that broadcasts polling 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 Leichiner, “The Complete Idiot’s Guide to PalmPilot and Palm III” 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

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