

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM ERICSSON
Petitioners

v.

INTELLECTUAL VENTURES I LLC
Patent Owner

Case No. Unassigned
Patent 6,628,629

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1-4
OF U.S. PATENT NO. 6,628,629

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	C. Ground 3: The Combination of Dyson/Raychaudhuri with Goodman and Yang Renders Claim 4 Obvious Under 35 U.S.C. § 103.....	67
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LIST OF EXHIBITS

1001	U.S. Patent No. 6,628,629 to Jorgensen (“the ’629 Patent”)
1002	CV of Zygmunt Haas
1003	Expert Declaration of Zygmunt Haas
1004	A Dynamic Packet Reservation Multiple Access Scheme for Wireless ATM by Deborah A. Dyson and Zygmunt J. Haas (“Dyson”)
1005	WATMnet: A Prototype Wireless ATM System for Multimedia Personal Communication by D. Raychaudhuri et al. (“Raychaudhuri”)
1006	U.S. Patent No. 5,020,056 to Chennakeshu (“Chennakeshu”)
1007	A Multimedia Synchronization Model and Its Implementation in Transport Protocols by Chun-Chuan Yang and Jau-Hsiung Huang (“Yang”)
1008	Packet Reservation Multiple Access for Local Wireless Communications by D.J. Goodman et al. (“Goodman”)
1009	PRMA/DA: A New Media Access Control Protocol for Wireless ATM by Jeong Geun Kim et al. (“Kim”)
1010	U.S. Patent No. 5,287,347 to Spanke
1011	IV Infringement Contentions, Exhibit B.
1012	Computer Dictionary & Handbook by Charles J. Sippl et al., 3rd ed. (1981) (“Computer Dictionary”)
1013	U.S. Provisional Patent Application No. 60/092542
1014	Computer Networks by Andrew S. Tanenbaum, 3rd ed. (1996)
1015	U.S. Patent No. 6,754,181 to Elliott
1016	U.S. Patent No. 5,185,860 to Wu
1017	Expert Declaration of Dr. Sylvia Hall-Ellis

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1018	“SWAN: An Indoor Wireless ATM network” by E. Hyden, et al. (1995)
1019	Mobile Cellular Telecommunications: Analog and Digital Systems by William C.Y. Lee, 2nd ed. (1995)
1020	NEC Combines High-Speed IP Packet Processing with ATM Switching, Japan Industrial Journal, May 22, 1998.
1021	RFC 2063
1022	RFC 1483

I. INTRODUCTION

Ericsson Inc. and Telefonaktiebolaget LM Ericsson (collectively, “Petitioners”) request *inter partes* review (“IPR”) under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.* of Claims 1-4 of U.S. Patent No. 6,628,629 (“the ’629 Patent”).

Petitioners assert that there is a reasonable likelihood that the challenged claims are unpatentable and request review of, and cancellation of, the challenged claims under 35 U.S.C. § 103.

A. Summary of Unpatentability Grounds

Ground	Summary
1	Claims 1, 3, and 4 are obvious in view of Dyson and Raychaudhuri
2	Claim 2 is obvious in view of Dyson, Raychaudhuri, and Chennakeshu
3	Claim 4 is obvious in view of Dyson, Raychaudhuri, Goodman, and Yang

II. MANDATORY NOTICES, STANDING, AND FEES

A. Mandatory Notices

Real Party in Interest: The real parties in interest are Ericsson Inc. and Telefonaktiebolaget LM Ericsson.

Related Matters: The ’629 Patent is subject to a pending lawsuit entitled Intellectual Ventures I LLC v. T-Mobile USA, Inc. et al., Case No. 2:17-cv-00577-

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