

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 7,359,971

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 12, 14-15, 18, 21-22, 25,
27, 33, and 37 OF U.S. PATENT NO. 7,359,971

Intellectual Ventures I LLC

Exhibit 2003

ERICSSON v. IV I

IPR2018-00727

TABLE OF CONTENTS

I. INTRODUCTION1

A. Summary of Unpatentability Grounds1

II. MANDATORY NOTICES, STANDING, AND FEES1

A. Mandatory Notices1

B. Certification of Grounds for Standing.....2

C. Fees.....2

III. OVERVIEW OF THE '971 PATENT3

A. Subject Matter of the '971 Patent.....3

IV. SUMMARY OF PRIOR ART5

A. Packet Reservation Multiple Access (PRMA).....5

B. Sending IP Packets Over Wireless ATM.....8

V. CLAIM CONSTRUCTION.....11

A. Isochronous – Claim 12.....11

B. No Periodic Variation – Claim 14.....13

C. Packet-Centric Protocol – Claim 12.....14

D. Means-Plus-Function Terms17

VI. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE.....25

A. Ground 1: The Combination of Dyson and Raychaudhuri Renders Claims 12, 14, 15, 21, 22, 25, 27, 33 and 37 Obvious Under 35 U.S.C. § 10325

B. Ground 2: The Combination of Dyson/Raychaudhuri with Ellesson Renders Claim 18 Obvious Under 35 U.S.C. § 10367

VII. CONCLUSION72

LIST OF EXHIBITS

1001	U.S. Patent No. 7,359,971 to Jorgensen (“the ’971 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. 6,459,682 to Ellesson et al. (“Ellesson”)
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 C.
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

Petition for *IPR* of U.S. Patent 7,359,971

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
1023	U.S. Patent No. 4,916,691 to Goodman
1024	Wireless ATM and AD-HOC Networks: Protocols and Architectures, C-K Toh (1997)
1025	U.S. Patent No. 6,862,622 to Jorgensen
1026	U.S. Patent No. 6,640,248 Jorgensen
1027	U.S. Patent No. 4,769,811 to Eckberg, Jr. et al.
1028	U.S. Patent No. 4,872,160 to Hemmady et al.

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 12, 14-15, 18, 21-22, 25, 27, 33, and 37 of U.S. Patent No. 7,359,971 (“the ’971 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 12, 14, 15, 21, 22, 25, 27, 33, and 37 are obvious in view of Dyson and Raychaudhuri
2	Claim 18 is obvious in view of Dyson, Raychaudhuri, and Elleson

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 ’971 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-JRG (E.D. Tex.) in which Petitioners Ericsson Inc. and Telefonaktiebolaget LM Ericsson are defendants. In addition, Petitioners have filed petitions for IPR against

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