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 7,412,517

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1, 2, 4, 12, 13, and 15 OF U.S. PATENT NO. 7,412,517



Intellectual Ventures I LLC

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LIST OF EXHIBITS

| 1001 | U.S. Pat. 7,412,517 to Jorgensen ("the '517 Patent") |
|------|---|
| 1002 | CV of Zygmunt Haas |
| 1003 | Expert Declaration of Zygmunt Haas |
| 1004 | U.S. Pat. 5,463,620 ("Sriram") |
| 1005 | Quality of Service-Oriented Medium Access Control for Wireless ATM Networks by Nikos Passas et al. ("Passas-I") |
| 1006 | U.S. Pat. 6,157,614 to Pasternak |
| 1007 | U.S. Pat. 6,862,622 to Jorgensen |
| 1008 | U.S. Pat. 6,640,248 to Jorgensen |
| 1009 | U.S. Pat. 4,916,691 to Goodman |
| 1010 | U.S. Provisional Patent Application No. 60/092,542 |
| 1011 | IV Infringement Contentions, Exhibit E. |
| 1012 | U.S. Pat. 6,400,701 to Lin |
| 1013 | "The Magic WAND Wireless ATM MAC-Final Report" by Passas et al. ("Passas-II") |
| 1014 | Expert Declaration of Dr. Sylvia Hall-Ellis |
| 1015 | Quality of Service-Oriented Medium Access Control for Wireless ATM Networks by Nikos Passas et al. ("Passas-I") (color copy of Ex. 1005) |
| 1016 | Quality of Service-Oriented Medium Access Control for Wireless ATM Networks by Nikos Passas et al. ("Passas-I") (second color copy of Ex. 1005) |
| | • |



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, 2, 4, 12, 13, and 15 of U.S. Patent No. 7,412,517 ("the '517 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 | The Combination of Passas-I and Sriram Renders Claims 1, 2, 4, |
| | 12, 13, and 15 Obvious Under 35 U.S.C. § 103 |
| 2 | The Combination of Passas-I, Sriram, and Lin Renders Claims |
| | 1, 2, 4, 12, 13, and 15 Obvious Under 35 U.S.C. § 103. |
| 3 | The Combination of Passas-I, Sriram, and Pasternak Renders |
| | Claims 1, 2, 4, 12, 13, and 15 Obvious Under 35 U.S.C. § 103. |
| 4 | The Combination of Passas-I, Sriram, Pasternak, and Lin |
| | Renders Claims 1, 2, 4, 12, 13, and 15 Obvious Under 35 U.S.C. |
| | § 103. |

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.



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