UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC Corporation, and HTC America, Inc., Petitioners

v.

INVT SPE, LLC Patent Owner

Case: IPR2018-01581 Patent No. 7,848,439

PATENT OWNER PRELIMINARY RESPONSE UNDER 35 U.S.C. § 313 AND 37 C.F.R. §42.107



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	A.	The Petition Fails to Demonstrate that the Proposed Combination Discloses "Assigning a Weight <i>Per Subband Group</i> to a Sum of Information Bits that Are Able to Be Assigned to All of the Subbands Within the Subband Group."				
	B.	The Petition Fails to Establish that a POSITA Would Combine <i>Cioffi</i> with Other References in the Proposed Combination31				
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		3.	The Petition relies on unsupported, conclusory expert testime for the alleged motivation to combine Cioffi with Li and Vijayan.	J
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