

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS, INC.,
Petitioner

v.

PARITY NETWORKS LLC,
Patent Owner

Case IPR2018-01643
Patent 6,831,891

**PATENT OWNER PARITY NETWORKS LLC'S PRELIMINARY
RESPONSE UNDER 37 C.F.R. § 42.107**

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EXHIBIT LIST

Previously Filed – Petitioner

Ex. No.	Description
1001	U.S. Patent No. 6,831,891 to Mansharamani (“’891 Patent”)
1002	Declaration of Dr. Nicholas Bambos
1003	Curriculum Vitae of Dr. Nicholas Bambos
1004	PCT International Application No. WO 00/02347 A2 to Schwartz et al. (“Schwartz”)
1005	PCT International Application No. WO 00/52882 A2 to Muller et al. (“Muller”)
1006	Canadian Patent Application No. CA 2 310 531 A1 to Firoiu et al. (“Firoiu”)
1007	June 13, 2002 Applicant’s Response to Office Action from the Prosecution History of the ‘891 Patent
1008	January 6, 2003 Applicant’s Response to Office Action from the Prosecution History of the ‘891 Patent
1009	February 13, 2004 Applicant’s Response to Office Action from the Prosecution History of the ‘891 Patent
1010	“Original Complaint” (Docket Entry #1) filed in <i>Parity Networks, LLC v. Juniper Networks, Inc.</i> , 6:17-cv-00495-RWS-KNM (E.D. Texas)
1011	Executed Summons (Docket Entry #9) filed in <i>Parity Networks, LLC v. Juniper Networks, Inc.</i> , 6:17-cv-00495-RWS-KNM (E.D. Texas)

I. STATEMENT OF MATERIAL FACTS IN DISPUTE

Petitioner Juniper Networks, Inc. (“Petitioner”) did not submit a statement of material facts in its Petition for *inter partes* review. Paper 1 (Petition). Accordingly, no response to a statement of material facts is due pursuant to 37 C.F.R. § 42.23(a), and no facts are admitted.

II. INTRODUCTION

Patent Owner Parity Networks LLC (“Patent Owner”) respectfully submits this Patent Owner Preliminary Response under 35 U.S.C. § 313 and 37 C.F.R. § 42.107(a). It is being timely filed on or before February 6, 2019 pursuant to 37 C.F.R. § 42.107(b).

“The Director may not authorize an *inter partes* review to be instituted unless the Director determines that the information presented in the petition filed under section 311 and any response filed under section 313 shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). Here, institution should be denied because Petitioner has failed to establish that there is a reasonable likelihood that it will prevail on any of its propositions of unpatentability.

A. STATEMENT OF RELIEF REQUESTED

Pursuant to 35 U.S.C. § 314(a), Patent Owner respectfully requests that the Board deny institution of a trial with respect to all claims of United States Patent

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