

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

IPR2018-01722

Cisco Systems, Inc.,  
Petitioner

vs.

TracBeam, LLC  
Patent Owner

---

PETITION FOR INTER PARTES REVIEW

OF

U.S. PATENT NO. 7,525,484

(CLAIMS 57 AND 59)

**TABLE OF CONTENTS**

PETITIONER’S EXHIBIT LIST .....4

I. Mandatory Notices.....5

    A. Real Party-in-Interest.....5

    B. Related Matters.....5

    C. Lead and Back-up Counsel and Service Information .....5

II. Grounds for Standing.....6

III. Requested Relief.....6

IV. Reasons for the Requested Relief.....6

    A. Summary of the ’484 patent .....7

    B. Priority Date .....9

    C. Summary of the Petition.....9

    D. Challenged Claims.....10

V. Claim Construction .....10

    A. “mobile station location evaluator” .....10

    B. “data indicative of one of: an error and a likelihood” .....12

VI. Statutory Grounds for Challenges .....13

VII. Petitioner’s multiple petitions are not redundant.....13

VIII. Level of Ordinary Skill in the Art .....14

IX. Note Regarding Page Citations & Emphasis.....15

X. Identification of How the Claims are Unpatentable .....15

A.	Challenge #1: Claim 57 is obvious over Sheffer in view of Dunn .....	15
1.	Summary of Sheffer .....	15
2.	Summary of Dunn .....	20
3.	Reasons to Combine.....	20
4.	Detailed Claim Analysis .....	23
B.	Challenge #2: Claim 59 is obvious over Sheffer, Dunn and Singer .....	54
1.	Summary of Singer .....	54
2.	Reasons to Combine.....	55
3.	Detailed Claim Analysis .....	57
XI.	Conclusion .....	61
XII.	Certificate of Word Count .....	62
	Certificate of Service .....	63

**PETITIONER'S EXHIBIT LIST**

September 14, 2018

CSCO-1001	U.S. Patent No. 7,525,484 to Dupray et al. (“the ’484 patent”)
CSCO-1002	Prosecution File History of U.S. Patent No. 7,525,484
CSCO-1003	Declaration of Dr. William Michalson under 37 C.F.R. § 1.68
CSCO-1004	Curriculum Vitae of Dr. William Michalson
CSCO-1005	U.S. Patent No. 5,844,522 to Sheffer et al. (“Sheffer”)
CSCO-1006	Reserved
CSCO-1007	Reserved
CSCO-1008	U.S. Patent No. 5,659,596 to Dunn (“Dunn”)
CSCO-1009	U.S. Patent No. 5,485,163 to Singer et al. (“Singer”)
CSCO-1010	Reserved
CSCO-1011	Preliminary Construction, <i>TracBeam LLC v. Cisco Systems, Inc.</i> , No. 6:17-cv-525.
CSCO-1012	Reserved
CSCO-1013	Reserved
CSCO-1014	Reserved
CSCO-1015	Reserved
CSCO-1016	Joint Claim Construction and Prehearing Statement, <i>TracBeam LLC v. Cisco Systems, Inc.</i> , No. 6:17-cv-525, Docket No. 60 (Apr. 18, 2018).
CSCO-1017	Reserved

**I. MANDATORY NOTICES**

**A. Real Party-in-Interest**

The Petitioner and real party in interest is Cisco Systems, Inc.

**B. Related Matters**

As of the filing date of this petition and to the best knowledge of the Petitioner, U.S. Patent No. 7,525,484 (“the ’484 patent”) is involved in the following litigation: *TracBeam, LLC v. Cisco Systems Inc.* (6-17-cv-00525, E.D. Tex.).

The ’484 patent has been the subject of prior *Inter Partes* proceedings, for example, *Apple, Inc. v. TracBeam LLC* (IPR2015-01696), *Apple, Inc. v. TracBeam LLC* (IPR2015-01697), *T-Mobile US, Inc. v. TracBeam LLC* (IPR2015-01711), and *T-Mobile US, Inc. v. TracBeam LLC* (IPR2016-00728) include challenges to at least some of the claims challenged in this Petition. However, the Petitioner Cisco Systems, Inc. was not a party in these proceedings, and they are now terminated.

**C. Lead and Back-up Counsel and Service Information**

Lead Counsel

**David L. McCombs**  
HAYNES AND BOONE, LLP  
2323 Victory Ave. Suite 700  
Dallas, TX 75219

Phone: 214-651-5533  
Fax: 214-200-0853  
david.mcombs.ipr@haynesboone.com  
USPTO Reg. No. 32,271

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.