

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Haller et al.
U.S. Patent No.: 7,295,532 IPR Control No.: IPR2015-01443
Issue Date: November 13, 2007 Atty Docket No.: 00035-0003IP2
Appl. Serial No.: 09/932,180
Filing Date: August 17, 2001
Title: SYSTEM, DEVICE AND COMPUTER READABLE
MEDIUM FOR PROVIDING NETWORKING SERVICES
ON A MOBILE DEVICE

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 7,295,532 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

- EXHIBIT-1001 U.S. Patent No. 7,295,532 to Haller, et al. (“the ’532 Patent”)
- EXHIBIT-1002 Reserved
- EXHIBIT-1003 Declaration of Dr. Sayfe Kiaei
- EXHIBIT-1004 Curriculum Vitae of Dr. Sayfe Kiaei
- EXHIBIT-1005 PCT Publication Number WO 2001/076154 (“Marchand”)
- EXHIBIT-1006 “Router Plugins: A Software Architecture for Next Generation Routers,” *Computer Communication Review* (1998), vol. 28, No. 4, p. 229-240 (“Router Plugins”)
- EXHIBIT-1007 U.S. Patent No. 6,622,017 to Hoffman, et al. (“Hoffman”)
- EXHIBIT-1008 802.11b, “Supplement to IEEE Standard for Information Technology – Telecommunications and Information Exchange Between Systems – Local and Metropolitan Area Networks – Specific Requirements. Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications: Higher-Speed Physical Layer Extension in the 2.4 GHz Band,” Print ISBN 0738118117, published January 20, 2000 (“802.11b”)
- EXHIBIT-1009 “IP Network Address Translator (NAT) Terminology and Considerations,” RFC 2663, August 1999 (“RFC 2663”)
- EXHIBIT-1010 U.S. Patent No. 6,535,498 to Larsson, et al. (“Larsson”)
- EXHIBIT-1011 U.S. Patent No. 6,963,912 to Schweitzer, et al. (“Schweitzer”)
- EXHIBIT-1012 U.S. Patent Application No. 09/541,529 to Marchand (“Marchand Priority”)

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.,
(collectively “Samsung”) and Apple Inc. (“Apple”) (Samsung and Apple,
collectively “Petitioners”) petition for Inter Partes Review (“IPR”) under 35 U.S.C.
§§ 311–319 and 37 C.F.R. § 42 of claims 1, 4, 5, 7-10, 12, 14-16, and 23-24
 (“Challenged Claims”) of U.S. Patent No. 7,295,532 (“’532 Patent”). As explained
in this petition, there exists a reasonable likelihood that Petitioners will prevail
with respect to at least one of the Challenged Claims.

I. MANDATORY NOTICES UNDER 37 C.F.R § 42.8(a)(1)

A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and
Apple Inc. are the real parties-in-interest.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

Petitioners are not aware of any disclaimers, reexamination certificates or
petitions for inter partes review for the ’532 Patent. The ’532 Patent is the subject
of a Civil Action Numbers 14-cv-4355 (U.S.D.C. S.D.N.Y.), filed June 17, 2014;
14-cv-4428 (U.S.D.C. S.D.N.Y.), filed June 18, 2014; and 14-cv-7954 (U.S.D.C.

S.D.N.Y.), filed October 2, 2014.¹

Concurrently with this petition, Petitioners are filing one (1) other petition for IPR (identified with attorney docket number 00035-0003IP1 and proceeding number IPR2015-01442) of the '532 Patent. The relationship between the limited grounds presented in these two petitions is discussed in Section VII.

C. Lead And Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)

Samsung provides the following designation of counsel.

LEAD COUNSEL	BACKUP COUNSEL
W. Karl Renner, Reg. No. 41,265 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 T: 202-783-5070 F: 202-783-2331	Kevin Greene, Reg. No. 46,031 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 T: 202-783-5070 F: 202-783-2331

D. Service Information

Please address all correspondence and service to counsel at the address provided in Section I(C). Samsung also consents to electronic service by email at IPR00035-0003IP2@fr.com.

¹ The unpatentability positions herein take into account Patent Owner's infringement positions in the co-pending litigation and in some instances are based in-part on these positions.

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