

**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

**Mail Stop Patent Board**

Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**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**

## TABLE OF CONTENTS

I.	MANDATORY NOTICES UNDER 37 C.F.R § 42.8(a)(1).....	1
	A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1).....	1
	B. Related Matters Under 37 C.F.R. § 42.8(b)(2).....	1
	C. Lead And Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3).....	2
	D. Service Information .....	2
II.	PAYMENT OF FEES – 37 C.F.R. § 42.103.....	3
III.	REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104.....	3
	A. Grounds for Standing Under 37 C.F.R. § 42.104(a).....	3
	B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested .....	3
IV.	SUMMARY OF THE '532 PATENT.....	6
	A. Brief Description.....	6
	B. Level of Ordinary Skill in the Art as of the Critical Date .....	9
V.	CLAIM CONSTRUCTION .....	10
	A-1. “software component...loaded...from the one or more devices connected to said one or more cellular networks” .....	11
VI.	MANNER OF APPLYING CITED PRIOR ART TO EVERY CLAIM FOR WHICH AN IPR IS REQUESTED, THUS ESTABLISHING A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '532 PATENT IS UNPATENTABLE .....	12
	A. [GROUND 1] – Claims 1, 4, 5, 8, 10, 12, and 14 are obvious over Marchand in view of Router Plugins in view of Hoffman under 35 U.S.C. § 103.....	12
	B. [GROUND 2] – Claim 7 is obvious over Marchand in view of Router Plugins in view of Hoffman in view of 802.11b under 35 U.S.C. § 103 .....	43
	C. [GROUND 3] – Claim 9 is obvious over Marchand in view of Router Plugins in view of Hoffman in view of RFC 2663 under 35 U.S.C. § 103 .....	46
	D. [GROUND 4] – Claim 10 is obvious over Marchand in view of Router Plugins in view of Hoffman in view of Larsson under 35 U.S.C. § 10348 .....	46
	E. [GROUND 5] – Claims 15, 16, and 24 are obvious over Marchand in view of Router Plugins in view of Hoffman in view of Schweitzer under 35 U.S.C. § 103.....	52
VII.	REDUNDANCY .....	59
VIII.	CONCLUSION .....	60

**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.<sup>1</sup>

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.

---

<sup>1</sup> 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.

# 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.