| UNITED STATES PATENT AND | TRADEMARK OFFICE |
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| BEFORE THE PATENT TRIAL | AND APPEAL BOARD |
| | |
| APPLE INC Petitioner | |
| V. | |
| UNILOC 2017 Patent Own | • |
| | |
| Case IPR2019- Patent 6,993,04 | |

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



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| | A. | | Larsson's broadcast message for route discovery is an inquiry message. | 12 |
| | В. | | Larsson discloses adding an additional data field to its inquiry message | 14 |
| | C. | | The combination of Larsson and BT Core render claims 11 and 12 obvious | 17 |
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| | A. | | IrOBEX discloses "the method comprising the primary station broadcasting a series of inquiry messages" | 20 |
| V. | | ВТ | Core (Ex. 1014) and IrOBEX (Ex. 1006) are valid prior art references | 23 |
| | A. | | Uniloc untimely argues BT Core and IrOBEX are inadmissible | 23 |
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| | | 3. OB | Additional documents corroborate the public availability of BT Core a | |
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UPDATED EXHIBIT LIST

| APPLE-1001 | U.S. Patent No. 6,993,049 to Davies ("'049 Patent") |
|------------|--|
| | |
| APPLE-1002 | Prosecution History of the '049 Patent ("the Prosecution History") |
| APPLE-1003 | Declaration of Dr. Charles Knutson |
| APPLE-1004 | Curriculum Vitae of Dr. Charles Knutson |
| APPLE-1005 | U.S. Patent No. 6,704,293 ("Larsson") |
| APPLE-1006 | IrDA Object Exchange Protocol ("IrOBEX") |
| APPLE-1007 | Prosecution History of the 7,587,207 Patent ("207 Prosecution History") |
| APPLE-1008 | Second Declaration of Dr. Charles Knutson |
| APPLE-1009 | U.S. Patent No. 7,587,207 ("Davies" or the "'207 Patent") |
| APPLE-1010 | U.S. Patent No. 6,570,857 ("Haartsen") |
| APPLE-1011 | U.S. Patent No. 6,480,505 ("Johansson") |
| APPLE-1012 | Specification of the Bluetooth System: Wireless connections made easy, Profiles, Vol. 2, Bluetooth, Dec. 1, 1999 ("BT Profiles") |
| APPLE-1013 | The New Shorter Oxford English Dictionary on Historical Principles, Vol. 1, Clarendon Press, 1993 ("Oxford Dictionary") |
| APPLE-1014 | Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 ("BT Core") |
| APPLE-1015 | U.S. Patent No. 6,683,886 ("Tuijn") |



| | Attorney Docket: 39521-0056IP1 |
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| APPLE-1016 | Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/specification.asp from March 1, 2000 |
| APPLE-1017 | Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/core.asp from March 1, 2000 |
| APPLE-1018 | Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/order.asp from March 1, 2000 |
| APPLE-1019 | Internet Archive Capture of http://www.bluetooth.com:80/news/archive/archive.asp from March 4, 2000 |
| APPLE-1020 | Declaration of Michael Foley |
| APPLE-1021 | The Concise Oxford English Dictionary, 5 th Ed., Oxford University Press, 1964 ("Concise Oxford English Dictionary") |
| APPLE-1022 | Amended Complaint dated May 30, 2018, <i>Uniloc USA v Apple Inc.</i> , Civil Action No. 1:18-cv-00164-LY, Western District of Texas, Austin Division ("Complaint") |
| APPLE-1023 | McGraw-Hill Dictionary of Electrical and Computer Engineering, ISBN 0-07-144210-3, 2004 |
| APPLE-1024 | Internet Archive Capture of https://web.archive.org/web/20000618190007/http://www.bluet ooth.com/text/news/archive/archive.asp?news=2 from June 18, 2000 |
| APPLE-1025 | U.S. Patent No. 6,622,018 ("Erekson") |
| APPLE-1026 | PCT Patent Application Publication No. WO 00/76238 ("Buttery") |
| APPLE-1027 | U.S. Patent No. 6,922,548 ("Moore") |
| APPLE-1028 | U.S. Patent No. 6,799,318 ("Davison") |



| | Attorney Docket: 39521-0056IP1 |
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| APPLE-1029 | U.S. Patent No. 6,779,185 ("Roukbi") |
| APPLE-1030 | U.S. Patent No. 6,982,962 ("Lunsford") |
| APPLE-1031 | U.S. Patent No. 6,255,800 ("Bork") |
| APPLE-1032 | U.S. Patent No. 6,975,205 ("French") |
| APPLE-1033 | Declaration of Mr. Peter Rysavy |
| APPLE-1034 | Declaration of Mr. Lawrence Faulkner |
| APPLE-1035 | Declaration of Dr. Charles Knutson ("Knutson_Dec.") |
| APPLE-1036 | "Wireless Wonders Coming Your Way" by Peter Rysavy, https://rysavyresearch.files.wordpress.com/2017/08/2000_05_w ireless_wonders.pdf, last accessed on January 8, 2020. |
| APPLE-1037 | Internet Archive Capture of https://web.archive.org/web/20000517192715/http://www.bluet ooth.com/text/news/archive/archive.asp?news=2, last accessed on January 8, 2020. |
| APPLE-1038 | Internet Archive Capture of https://web.archive.org/web/20000518114920/http://www.bluet ooth.com/text/news/archive/archive.asp?news=list, last accessed on January 8, 2020. |
| APPLE-1039 | Oregon State University Open Source Lab Webpage, http://netwinder.osuosl.org/pub/netwinder/docs/nw/irda/, last visited January 8, 2020. |
| APPLE-1040 | Stuart Williams, <i>IrDA: Past, Present and Future</i> , IEEE Personal Communications, Vol. 7, Issue 1, 11-19, Feb. 2000 |
| APPLE-1041 | The IrDA Standards for High-Speed Infrared Communications, The Hewlett-Packard Journal, February, 1998. |



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