

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC., LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC.,
AND LG ELECTRONICS MOBILECOMM U.S.A., INC.

Petitioner

v.

UNILOC 2017 LLC

Patent Owner

IPR2019-00251

PATENT 6,993,049

PATENT OWNER PRELIMINARY RESPONSE TO PETITION

PURSUANT TO 37 C.F.R. §42.107(a)

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Exhibit No.	Description
2001	Excerpts from Microsoft Computer Dictionary, Fourth Edition, 1999

I. INTRODUCTION

UNILOC 2017 LLC (the “Uniloc” or “Patent Owner”) submits this Preliminary Response to Petition IPR2019-00054 for *Inter Partes* Review (“Pet.” or “Petition”) of United States Patent No. 6,304,612 (“the ’612 Patent” or “EX1001”) filed by Apple, Inc., LG Electronics Inc., LG Electronics U.S.A. Inc. and LG Electronics Mobilecomm U.S.A. Inc. (“Petitioners”). The instant Petition is procedurally and substantively defective for at least the reasons set forth herein.

II. THE ’049 PATENT

The ’049 patent is titled “Communication system.” The ’049 patent issued January 31, 2006, from U.S. Patent Application No. 09/876,514 filed June 7, 2001.

The inventors of the ’049 patent observed that at the time of the invention, there was an increasing interest in enabling devices to interact via wireless communication links, thereby avoiding the need for extensive cabling. An example of a communication system which may be used for such wireless links is a Bluetooth network, operating according to the specification defined by the Bluetooth Special Interest Group. EX1001, 1:9-15.

One application for which use of Bluetooth was proposed was the connection of controller devices to host systems. A controller device, also known as a Human/machine Interface Device (HID), is an input device such as a keyboard, mouse, games controller, graphics pad or the like. Such HIDs did not typically require a link having high data throughput, but did require a very responsive link.

A Bluetooth system was more than capable of supporting the throughput requirements of HIDs. However, the degree of responsiveness required could be

more difficult to achieve. An active Bluetooth link could offer a reasonably responsive service, but this required both the setting up of a link and its maintenance, even during periods of inactivity. EX1001, 1:27-39. Setting up a link required a HID to join, as a slave, the piconet including the host system (which would typically act as piconet master, i.e. a base station). Joining the piconet required two sets of procedures, namely 'inquiry' and 'page'. Inquiry allowed a would-be slave to find a base station and issued a request to join the piconet. Page allowed a base station to invite slaves of its choice to join the net. Analysis of those procedures indicated that the time taken to join a piconet and then to be in a position to transfer user input to the master could be several tens of seconds. EX1001, 1:52-61.

According to the invention of the '049 Patent, there is provided a communications system comprising a primary station and at least one secondary station, wherein the primary station has means for broadcasting a series of inquiry messages, each in the form of a plurality of predetermined data fields arranged according to a first communications protocol, and means for adding to an inquiry message prior to transmission an additional data field for polling at least one secondary station, and wherein the or each polled secondary station has means for determining when an additional data field has been added to the plurality of data fields, for determining whether it has been polled from the additional data field and for responding to a poll when it has data for transmission to the primary station. EX1001, 2:22-35.

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