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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GUEST TEK INTERACTIVE ENTERTAINMENT LTD., Petitioner,

v.

NOMADIX, INC., Patent Owner.

Case IPR2019-00253 Patent 8,626,922

PATENT OWNER'S SUR-REPLY TO REPLY IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW



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II.	CLAIM CONSTRUCTION				
III.	THE BOARD SHOULD CONFIRM THE PATENTABILITY OF THE '922 PATENT				
	A.	Petit	ioner fails to carry its burden for Grounds 1 and 3		
		1.	Bonomi does not calculate a delay period		
		2.	A POSITA would not be motivated to combine Bonomi and Borella		
		3.	A POSITA would not be motivated to combine Bonomi and Teraslinna		
	B.	Petit	ioner fails to carry its burden for Ground 3		
		1.	Petitioner did not meet its burden to show Rupp is prior art		
		2.	Rupp does not disclose a user profile record comprising a network communication bandwidth or data transmission parameter associated with the user device within the constraints of claims 1 and 9		
		3.	One of ordinary skill in the art would neither be motivated to combine Chandran and Rupp, nor have a reasonable expectation of succeeding in combining the two to arrive at the claimed inventions		
		4.	Petitioner fails to carry its burden of demonstrating Rupp is analogous art		



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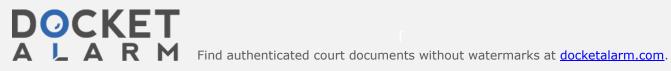


EXHIBIT LIST

Exhibit No.	Description
2001	(Withdrawn) Declaration of Dean Sirovica, Ph.D.
2002	Declaration of Payson LeMeilleur in Support of Motion to Appear Pro Hac Vice on Behalf of Patent Owner Nomadix
2003	Declaration of Kendall M. Loebbaka in Support of Motion to Appear Pro Hac Vice on Behalf of Patent Owner Nomadix
2004	Declaration of Stuart G. Stubblebine, Ph.D.
2005	Deposition Transcript of Dr. Peter Dordal, dated September 13, 2019
2006	Errata and Signature Pages – Dordal Transcript
2007	Declaration of Mark Lezama in Support of Motion to Appear Pro Hac Vice on Behalf of Patent Owner Nomadix



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