

***Apple Inc.***

***v.***

***Uniloc 2017 LLC***

**IPR2019-00251 (Patent 6,993,049)**

**Patent Owner's Demonstrative Exhibits**

**Before SALLY C. MEDLEY, JEFFREY S. SMITH, and  
GARTH D. BAER, *Administrative Patent Judges***

**April 23, 2020**

# Overview

- **BT Core is not shown to be prior art**
- **IrOBEX is not shown to be prior art**
- **Petitioner's belated evidence should be given no weight**
- **Claim construction: "additional data field," "broadcasting," "inquiry message[s]"**
- **Claim 11: "adding to an inquiry message prior to transmission an additional data field for polling at least one secondary station"**
- **IrOBEX is not shown to disclose "the method comprising the primary station broadcasting a series of inquiry messages"**

# BT Core is not shown to be prior art

- Nothing in the Petition itself, its attached declarations, or in the unexplained citations, establishes that BT Core was publicly accessible before June 26, 2000.
- All Petitioner is left with is asserting the date appearing on the face of the BT Core document for the truth of the matter asserted—i.e., inadmissible hearsay.

# BT Core is not shown to be prior art

- First, Petitioner here “relies on ‘Wayback Machine’ screenshots to show what may have been posted in [March of 2000], but the screenshots do not show the [BT Core document], but only a hyperlink.” IPR2015-01835, Paper 56 at 20; *see also* Exs. 1016–1019.
- Second, “[i]f a user attempts to access the hyperlink” allegedly linking to BT Core itself, “the Wayback Machine displays an error message” only. *Id.* This “makes it impossible to test the veracity of [Petitioner’s] assertion that the [BT Core document] marked as Ex. 1014 actually appeared at this link.” *Id.*
- Third, the Petition fails to establish that BT Core was obtained through any hyperlink of Exhibits 1016-1019.
- Finally, the Petition also fails to provide the actual source for BT Core (Ex. 1014).

DEMONSTRATIVE – NOT EVIDENCE

# IrOBEX is not shown to be prior art

- The Petition offers the conclusory statement that “the IrOBEX protocol was published on a website, [www.irda.org](http://www.irda.org), maintained by the Infrared Data Association and available to the general public through the website.” Pet. 2.
- As alleged support, Petitioner cites, without explanation, to Dr. Knutson’s declaration. *Id.* (citing Ex. 1008 at ¶¶ 2–11, 14–20).

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