

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., LG ELECTRONICS, INC., SAMSUNG ELECTRONICS CO.,
LTD., AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners

v.

UNILOC 2017 LLC,
Patent Owner

Case IPR2019-00510
Patent 6,868,079

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I. CLAIM 17 IS OBVIOUS (GROUNDS 1 & 2).....2

A. THE COMBINATION OF WOLFE AND BOUSQUET (GROUND 1)
AND WOLFE, BOUSQUET, AND EVERETT (GROUND 2)
RENDERS OBVIOUS THE RETRANSMISSION LIMITATION.....3

1. THE PETITION PRESENTS AN EVIDENCE-BASED
COMBINATION ANALYSIS BASED ON WOLFE AS A PRIMARY
REFERENCE4

2. A POSITA WOULD HAVE FOUND IT OBVIOUS TO USE
BOUSQUET'S METHOD OF RE-TRANSMISSION IN THE PROPOSED
COMBINATION.....6

3. UNILOC'S ARGUMENTS RELATED TO THE "USE OF
RANDOMLY SELECTED TIME INTERVALS" OF EVERETT ARE
UNPERSUASIVE (GROUND 2)8

4. THE PROPOSED COMBINATIONS RENDER OBVIOUS THE
RETRANSMISSION LIMITATION10

B. THE COMBINATIONS WITH PATSIOKAS ARE PROPER.....11

1. A POSITA WOULD HAVE FOUND IT OBVIOUS TO COMBINE
PATSIOKAS WITH WOLFE AND BOUSQUET OR WITH WOLFE,
BOUSQUET, AND EVERETT.12

2. UNILOC'S ARGUMENT THAT SATELLITE SYSTEMS DO NOT
HAVE RANGE ISSUES IS FACTUALLY INCORRECT AND BASED
SOLELY ON ATTORNEY ARGUMENT16

II. THE BOARD SHOULD FIND CLAIM 18 UNPATENTABLE20

III. CONCLUSION24

UPDATED EXHIBIT LIST

- Exhibit-1001 U.S. Patent No. 6,868,079 to Hunt (“the ’079 Patent”)
- Exhibit-1002 Excerpts of Prosecution History of the ’079 Patent (Serial No. 09/455,124)
- Exhibit-1003 Declaration of Paul G. Steffes, Ph.D.
- Exhibit-1004 *Curriculum Vitae* of Paul G. Steffes, Ph.D.
- Exhibit-1005 U.S. Patent No. 4,763,325 to Wolfe *et al.* (“Wolfe”)
- Exhibit-1006 U.S. Patent No. 6,298,052 to Bousquet *et al.* (“Bousquet”)
- Exhibit-1007 PCT Publication WO 1992/021214 to Patsiokas *et al.* (“Patsiokas”)
- Exhibit-1008 John L. Everett, *Very Small Aperture Terminal (VSATs)*, Institution of Electrical Engineers (IEE), Telecommunication Series 28, First Edition (1992) (“Everett”) (select portions)
- Exhibit-1009 C. Retnadhas, Satellite Multiple Access Protocol, IEEE Communications Magazine, 1980 (“Retnadhas”)
- Exhibit-1010 U.S. Patent No. 6,212,360 to Fleming, III *et al.* (“Fleming”)
- Exhibit-1011 ITU-T G.114, *Transmission Systems and Media. General Recommendations on the Transmission Quality for an Entire International Telephone Connection. One-Way Transmission Time*, Telecommunication Standardization Sector of ITU, 1994 (“ITU Standards”)

- Exhibit-1012 Joint Claim Construction and Prehearing Statement, District Court Case No. 2-18-cv-00042, (“Joint CC”)
- Exhibit-1013 Exhibit A of Joint CC (“Exh-A of Joint CC”)
- Exhibit-1014 Fredrick J. Hill & Gerald R. Peterson, Introduction to Switching Theory and Logical Design, Second Edition (1968) (select portions) (“Hill”)
- Exhibit-1015 Newton’s Telecom Dictionary, 12th Edition (1997) (select portions)
- Exhibit-1016 The IEEE Standard Dictionary of Electrical and Electronic Terms, Sixth Edition (1996) (select portions)
- Exhibit-1017 Munford Declaration
- Exhibit-1018 Second Declaration of Paul G. Steffes, Ph.D.
- Exhibit-1019 Joe Flower, Iridium, Wired (November 1993) (“Iridium”) (select portions)
- Exhibit-1020 Honey Berman, LEOs and MEOs, Via Satellite (March 1998) (“Via Satellite”)
- Exhibit-1021 John L. Everett, *Very Small Aperture Terminal (VSATs)*, Institution of Electrical Engineers (IEE), Telecommunication Series 28, First Edition (1992) (“Everett-2”) (Supplemental set of select portions)
- Exhibit-1022 Robert G. Winch, *Telecommunication Transmission Systems*, McGraw-Hill Telecommunications, Second Edition (1998) (“Winch”) (select portions)

Apple Inc., LG Electronics, Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioners”) submit this Reply to Patent Owner’s Response (“Response”) to the Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 6,868,079 (“the ’079 Patent”) filed by Patent Owner, Uniloc 2017, LLC (“Uniloc”).

In the Response, Uniloc raises just two arguments against the substantive combinations presented in Grounds 1 and 2. Both of these substantive arguments were raised in Uniloc’s preliminary response and rejected in the Institution Decision. *See* Institution Decision, 21-23. Because Uniloc has not presented any evidence in rebuttal to Petitioners’ evidence or in support of Uniloc’s arguments, Uniloc has not advanced the evidentiary record beyond the record already considered at the time of institution. Thus, Uniloc has done nothing that warrants reconsideration of the reasonable likelihood of success found at institution and Uniloc’s two arguments should be rejected.

First, Uniloc argues that each of the applied references individually fails to disclose that “the at least one respective secondary station re-transmits the same respective request in consecutive allocated time slots without waiting for an acknowledgement until said acknowledgement is received from the primary station” (“retransmission limitation”). Uniloc’s argument, however, never addresses the combinations presented in the Petition. Instead, Uniloc improperly

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