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

IPR2019-00510

PATENT 6,868,079

PATENT OWNER RESPONSE

Table of Contents

EXHIBIT LIST

EX2001	Claim Construction Memorandum and Order entered in *Uniloc USA, Inc. v. Samsung Electronics America Inc.*, Case No. 2:18-cv-0042-JRG-RSP, D.I. 93 (E.D. Tex. Apr. 18, 2019) and *Uniloc USA, Inc. v. Huawei Device USA, Inc.*, Case No. 2:18-cv-0075-JRG-RSP, D.I. 57 (E.D. Tex. Apr. 18, 2019)

I. INTRODUCTION

Uniloc 2017 LLC (the "Uniloc" or "Patent Owner") submits this Response to Petition for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 6,868,079 ("the '079 patent" or "EX1001") filed by Apple Inc., LG Electronics Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. ("Petitioners"). The Petition is defective for at least the reasons set forth herein.

II. THE '079 PATENT

The '079 patent is titled "Radio communication system with request re-transmission until acknowledged." The '079 patent issued March 15, 2005, from U.S. Patent Application No. 09/455,124 filed December 6, 1999, which claims priority to United Kingdom Patent Application No. GB9827182, filed December 10, 1998.

The inventors of the '079 patent observed that in radio communication systems at the time, it was generally required to be able to exchange signaling messages between a Mobile Station (MS) and a Base Station (BS). Downlink signaling (from BS to MS) was usually realized by using a physical broadcast channel of the BS to address any MS in its coverage area. Since only one transmitter (the BS) uses this broadcast channel there is no access problem. EX1001, 1:17-23.

However, uplink signaling (from MS to BS) required more detailed considerations. If the MS already had an uplink channel assigned to it, for voice or data services, this signaling could be achieved by piggybacking, in which the signaling messages are attached to data packets being sent from the MS to the BS. But if there was no uplink channel assigned to the MS, piggybacking is not possible.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.