

~~Filed on behalf of Google LLC~~

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re *Inter Partes* Review of:)
U.S. Patent No. 9,445,251)
Issued: September 13, 2016)
Application No.: 14/633,804)

For: Method to Provide Ad Hoc and Password Protected Digital and Voice
Networks

FILED VIA E2E

~~UNITED STATES PATENT AND TRADEMARK OFFICE~~

~~BEFORE THE PATENT TRIAL AND APPEAL BOARD~~

~~GOOGLE LLC
Petitioner~~

~~v.~~

~~AGIS SOFTWARE DEVELOPMENT, LLC
Patent Owner~~

~~Case IPR2018-01083
Patent 9,445,251~~

~~PETITION FOR *INTER PARTES* REVIEW~~

Inter Partes Review of U.S. Patent No. 9,445,251

OF U.S. PATENT NO. 9,445,251

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~~U.S. Patent & Trademark Office~~
~~P.O. Box 1450~~
~~Alexandria, VA 22313-1450~~

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2. The combination of Fumarolo-782, Fumarolo-844, Muramatsu, and Liu renders independent claims 1 and 24 obvious.	2325
3. Claim 2 is obvious.	4951
4. Claims 4 and 27 are obvious.	5052
5. Claim 5 is obvious.	5153
6. Claims 6 and 29 are obvious.	5254
7. Claims 8 and 31 are obvious.	5355
8. Claim 10 is obvious.	5759
9. Claims 12 and 35 are obvious.	5860
10. Claim 22 is obvious.	5961
11. Claim 23 are obvious.	5961
12. Claim 32 is obvious.	6062
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Inter Partes Review of U.S. Patent No. 9,445,251

EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,445,251 to Beyer, Jr. <i>et al.</i> , issued September 13, 2016 (“251 Patent”)
1002	File History of U.S. Patent No. 9,445,251 (“251 Patent File History”)
1003	Declaration of David Hilliard Williams (“Williams”)
1004	<i>Curriculum Vitae</i> of David Hilliard Williams
1005	U.S. Patent No. 6,366,782 to Fumarolo <i>et al.</i> , issued April 2, 2002 (“Fumarolo-782”)
1006	U.S. Patent No. 6,204,844 to Fumarolo <i>et al.</i> , issued March 20, 2001 (“Fumarolo-844”)
1007	U.S. Patent Application Publication No. 2002/0173906 to Muramatsu, published November 21, 2002, (“Muramatsu”)
1008	U.S. Patent Application Publication No. 2002/0027901 to Liu <i>et al.</i> , issued March 7, 2002 (“Liu”)
1009	Plaintiff’s Original Complaint for Patent Infringement, <i>AGIS Software Development LLC v. Huawei Device USA Inc., et al.</i> , Case No. 2:17-cv-00513 (TXED), filed June 21, 2017. (“Infringement Complaint”)
1010	U.S. Patent No. 7,031,728 to Beyer, Jr., issued April 18, 2006 (“728 Patent”)
1011	U.S. Patent No. 7,630,724 to Beyer, Jr. , <i>et al.</i> , issued December 8, 2009 (“724 Patent”)
1012	911 and E911 Services, Federal Communications Commission, www.fcc.gov/e911 (last visited May 7, 2018)
1013	Fact Sheet, FCC Wireless 911 Requirements (January 2001), <i>available at</i> https://transition.fcc.gov/pshs/services/911-services/enhanced911/archives/factsheet_requirements_012001.pdf
1014	Jock Christie, <i>et al.</i> , <i>Development and Deployment of GPS Wireless Devices for E911 and Location Based Services</i> (Position, Location, and Navigation Symposium, 2002) (“Christie”)
1015	Dale N. Hatfield, <i>A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services</i> , Federal Communications Commission (2002) (“Hatfield”)

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