UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

UNILOC 2017 LLC,
Patent Owner

U.S. Patent No. 8,018,877

Inter Partes Review No.: IPR2019-00701

**PETITIONER'S REPLY TO PATENT
OWNER'S RESPONSE TO PETITION**

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
Alexandria, VA 22313-1450

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Exhibits

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1001	U.S. Patent No. 8,018,877 to Lin
1002	Declaration of Dr. Henry Houh
1003	File History of U.S. Pat. No. 8,018,877 to Lin
1004	File History of U.S. Pat. No. 7,961,663 to Lin
1005	U.S. Pat. No. 6,699,125 ("**Kirmse**")
1006	U.S. Pat. App. Pub. No. US 2003/0142654 ("**Chambers**")
1007	European Pat. App. Pub. EP 1 385 323 A1 ("**Cordenier**")
1008	Complaint for Patent Infringement dated February 22, 2018 ("**Uniloc Complaint**")
1009	*Declaration* by Alexa Morris with the exhibit "draft-rosenberg-midcom-turn-00.txt", *Traversal Using Relay NAT* ("**TURN**")
1010	*Declaration of Sandy Ginoza for IETF RFC 793: Transmission Control Protocol* with the exhibit, RFC 793, "Transmission Control Protocol" ("**RFC793**")
1011	U.S. Pat. App. Pub. No. 2003/0217174 ("**Dorenbosch**")
1012	U.S. Patent No. 7,961,663 to Lin ("**663 Patent**")
1013	*Declaration of Sandy Ginoza for IETF RFC 3103: Realm Specific IP: Protocol Specification* with exhibit, RFC 3103, "Realm Specific IP: Protocol Specification" ("**RSIP**")
1014	Certified Translation and Original of European Pat. App. Pub. EP 1 009 153 A1 ("**Alos**")
1015	*Declaration* by Alexa Morris with the exhibit "draft-rosenberg-sipping-ice-00.txt," Interactive Connectivity Establishment (ICE): A Methodology for Network Address Translator (NAT) Traversal for the Session Initiation Protocol (SIP) ("**ICE**")
1016	U.S. Patent No. 7,969,925 to Lin ("**925 Patent**")
1017	*Declaration of Sandy Ginoza for IETF RFC 1918: Address Allocation for Private Internets* with exhibit, RFC 1918, "Address Allocation for Private Internets" ("**NAT**")

Exhibits continued

Exhibit No.	Description
1018	U.S. Patent No. 8,539,552 ("**Grabelsky**")
1019	*Declaration of Sandy Ginoza for IETF RFC 3489: STUN - Simple Traversal of User Datagram Protocol (UDP) Through Network Address Translators (NATs)* with the exhibit, RFC 3489, "STUN - Simple Traversal of User Datagram Protocol (UDP) Through Network Address Translators (NATs)" ("**STUN**")
1020	January 3, 2011 Amendment and Response to Office Action from file history of U.S. Pat. No. 7,969,925 to Lin
1021	U.S. Pat. App. No. 10/817,994 to Lin
1022	U.S. Pat. App. No. 10/935,342 to Lin
1023	U.S. Pat. App. No. 11/042,620 to Lin
1024	*Declaration of Sandy Ginoza for IETF RFC 2026: The Internet Standards Process – Revision 3* with the exhibit, RFC 2026: "The Internet Standards Process – Revision 3" ("**Internet Standards Process**")
1025	Declaration of Dr. Henry H. Houh In Support of Petitioner's Reply to Patent Owner's Response to Petition
1026	Merriam-Webster's Collegiate Dictionary, 10th Ed., (2002) definition of "allocate"

I. INTRODUCTION

Patent Owner's ("PO's") Response, Paper 9, (the "POR") primarily rehashes arguments from PO's Preliminary Response that the Board already considered and correctly rejected in its Institution Decision. PO does not explain or clarify its arguments in response to the Board's feedback that they were unclear, or support them with the testimony of any expert to address the Board's feedback that they were unpersuasive. PO's arguments should be rejected again for the reasons set forth in the Board's Institution Decision and for the reasons set forth below.

II. THE CHALLENGED CLAIMS ARE UNPATENTABLE

A. Ground 1: Claims 1-20 are Unpatentable Over the Combination of Kirmse (Ex. 1005) and Chambers (Ex. 1006)

The only dispute PO raises with respect to Ground 1 is that Kirmse fails to disclose "transmitting a request to a server to allocate a network address and port associated with the server" (the "allocating limitation") because Kirmse only discloses requests to join pre-existing games. POR at 6-8. This argument fails for at least two reasons. First, PO fails to respond to the showing in the Petition and Institution Decision that Kirmse discloses requests to *start* a game, waiving any such response. Second, Kirmse's disclosure of requests to join a game clearly satisfies the ordinary meaning of the allocating limitation.

As established in the Petition, Kirmse discloses an embodiment in which a player *starts* a multiplayer game.

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