### 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
Filing Date: April 4, 2011
Issue Date: September 13, 2011
Title: Mobile Conferencing Method and System

Inter Partes Review No.: IPR2019-00701

PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 8,018,877 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-100, ET SEQ.



## TABLE OF CONTENTS

			Page	
I.	Intro	oduction	1	
II.	Con	npliance with Formal Requirements	1	
	A.	Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)	1	
	B.	Proof of Service on the Patent Owner	2	
	C.	Power of Attorney	3	
	D.	Standing	3	
	E.	Fees	3	
III.	Statement of Precise Relief Requested		3	
	A.	Prior Art	3	
	B.	Grounds	5	
IV.	This	Petition is Proper Under 35 U.S.C. §§ 314(A) and 325(D)	6	
V.	Full	Full Statement of Reasons for Requested Relief6		
	A.	Summary of the 877 Patent	6	
	B.	Claims of the 877 Patent	7	
	C.	Effective Filing Date	8	
	D.	Person of Ordinary Skill in the Art	10	
	E.	Claim Construction Under 37 C.F.R. § 42.104(b)(3)	14	
VI.	Ground 1: Kirmse in View of Chambers Renders Obvioius Claims 1-2016			
	A.	Kirmse Overview	16	
	B.	Chambers Overview	16	
	C.	Analysis	17	
VII.	Ground 2: Chambers in View of RSIP Renders Obvious Claims 1-2034			
	A.	Chambers Overview	34	
	B.	RSIP Overview	34	
	C.	Statement of Rationale for the Combination of Chambers and RSIP	35	
	D.	Analysis	39	



## TABLE OF CONTENTS (continued)

			Page
VIII.	Grou	nd 3: Cordenier in View of TURN Rendeers Obvious Claims 1-3,	
	5-10,	12-20	48
	A.	Cordenier Overview	48
	B.	TURN Overview	50
	C.	Statement of Rationale for Combining Cordenier and TURN	54
	D.	Analysis	56
IX.	Conclusion6		68



## **EXHIBIT LIST**

Exhibit No.	Description
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 (" <b>Kirmse</b> ")
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 (" <b>Dorenbosch</b> ")
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" (" <b>RSIP</b> ")
1014	Certified Translation and Original of European Pat. App. Pub. EP 1 009 153 A1 (" <b>Alos</b> ")
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 (" <b>925 Patent</b> ")
1017	Declaration of Sandy Ginoza for IETF RFC 1918: Address Allocation for Private Internets with exhibit, RFC 1918, "Address Allocation for Private Internets" ("NAT")



Exhibit No.	Description
1018	U.S. Patent No. 8,539,552 (" <b>Grabelsky</b> ")
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")



# DOCKET A L A R M

# 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.

