

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Robert J. Davies  
U.S. Patent No.: 7,587,207 Attorney Docket No.: 39521-0058IP1  
Issue Date: September 8, 2009  
Appl. Serial No.: 09/876,515  
Filing Date: June 7, 2001  
Title: DATA DELIVERY THROUGH BEACONS

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT  
NO. 7,587,207 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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## EXHIBITS

APPLE-1001	U.S. Patent No. 7,587,207 to Davies (“’207 Patent”)
APPLE-1002	Prosecution History of the ’207 Patent (“the Prosecution History”)
APPLE-1003	Declaration of Dr. Charles Knutson
APPLE-1004	Curriculum Vitae of Dr. Charles Knutson
APPLE-1005	U.S. Patent No. 6,738,628 (“McCall”)
APPLE-1006	U.S. Patent No. 5,806,017 (“Hancock”)
APPLE-1007	Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 (“BT Core”)
APPLE-1008	U.S. Patent No. 6,255,800 (“Bork”)
APPLE-1009	[Reserved]
APPLE-1010	Internet Archive Capture of <a href="http://www.bluetooth.com:80/developer/specification/specification.asp">http://www.bluetooth.com:80/developer/specification/specification.asp</a> from March 1, 2000
APPLE-1011	Internet Archive Capture of <a href="http://www.bluetooth.com:80/developer/specification/core.asp">http://www.bluetooth.com:80/developer/specification/core.asp</a> from March 1, 2000
APPLE-1012	Internet Archive Capture of <a href="http://www.bluetooth.com:80/developer/specification/order.asp">http://www.bluetooth.com:80/developer/specification/order.asp</a> from March 1, 2000
APPLE-1013	Internet Archive Capture of <a href="http://www.bluetooth.com:80/news/archive/archive.asp">http://www.bluetooth.com:80/news/archive/archive.asp</a> from March 4, 2000
APPLE-1014	U.S. Patent No. 6,704,293 (“Larsson”)

APPLE-1015	PCT Patent Application Publication No. WO 01/41371 ("Rune")
APPLE-1016	PROOF OF SERVICE, Civil Action No. 1:18-CV-159 R P, March 5, 2018

Apple Inc. (“**Petitioner**”) petitions for *Inter Partes* Review (“**IPR**”) of claims 1-3, 5, 6, and 9-11 (“the Challenged Claims”) of U.S. Patent No. 7,587,207 (“**’207 Patent**”). As explained in this petition, there exists a reasonable likelihood that Petitioner will prevail with respect to at least one of the Challenged Claims.

The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. Apple respectfully submits that an IPR should be instituted, and that the Challenged Claims should be canceled as unpatentable.

**I. REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104**

**A. Grounds for Standing Under 37 C.F.R. § 42.104(a)**

Petitioner certifies that the ’207 Patent is available for IPR, and that Petitioner is not barred or estopped from requesting IPR of the Challenged Claims on the grounds identified in this petition. Petitioner was first served with a complaint of infringement of the ’207 patent less than one year prior to the filing of this Petition. Ex. 1016 (“PROOF OF SERVICE” on “03/01/2018”).

**B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested**

Petitioner requests IPR of the Challenged Claims based on the following grounds:

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