

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Robert J. Davies
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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 <http://www.bluetooth.com:80/developer/specification/specification.asp> from March 1, 2000
- APPLE-1011 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/core.asp> from March 1, 2000
- APPLE-1012 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/order.asp> from March 1, 2000
- APPLE-1013 Internet Archive Capture of <http://www.bluetooth.com:80/news/archive/archive.asp> 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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