Case IPR2019-00819 Patent 7,620,810

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

MPH TECHNOLOGIES OY, Patent Owner.

> Case IPR2019-00819 Patent 7,620,810

PATENT OWNER'S RESPONSE PURSUANT TO 37 C.F.R. § 42.120

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1.	The Petition Fails to Establish that the Prior Art Teaches the "Security Gateway" in "At Least One Mobile Terminal and Another Terminal and a Security Gateway Therebetween" and Other Limitations				
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		1. The Use of Tunnel Mode Does Not Mean that a Security Gateway is Present			
		2. The Use of Tunnel Mode Does not "Suggest" that a Correspondent Host is Actually a Security Gateway			
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2.	Discl Tern	Petition Also Fails to Establish that the Prior Art oses the "Other Terminal" in "At Least One Mobile ninal and Another Terminal and a Security Gateway ebetween" and Other Limitations45			
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3. The Petition Also Fails to Establish that the Prior Art Teaches "While at the Second Address, the Mobile

DOCKET

			Terminal Sending a Request Message to the Address of the Security Gateway to Change the Secure Connection to Be Defined Between the Second Address and the Address of the Security Gateway"	1	
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