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
U.S. Patent No. 7,620,810

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE UNDER 37 C.F.R. § 42.23

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
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PETITIONER'S EXHIBIT LIST

Apple (EX) Exhibit #	*Description*
1001	U.S. Patent No. 7,620,810 ("'810 patent").
1002	Declaration of Dr. David Goldschlag in Support of Petition for *Inter Partes* Review of U.S. Patent No. 7,620,810 ("Goldschlag Decl.").
1003	Prosecution History of U.S. Patent No. 7,620,810 ("Prosecution History").
1004	U.S. Patent No. 6,904,466 to Ishiyama *et al.* ("Ishiyama").
1005	U.S. Patent No. 7,028,337 to Murakawa ("Murakawa").
1006	U.S. Patent No. 6,976,177 to Ahonen ("Ahonen").
1007	U.S. Patent No. 6,954,790 to Forslöw ("Forslöw").
1008	Demystifying the IPsec Puzzle, Sheila Frankel, Published 2001 ("Frankel").
1009	IP Security - The Internet Protocol Journal – Volume 3, No. 1, William Stallings, Published March 2000.
1010	Mobility-aware IPsec ESP tunnels, Francis Dupont, IETF Draft Posted February 22, 2001. https://tools.ietf.org/html/draft-dupont-movesptun-00 ("Dupont").
1011	RFC2401 - S. Kent, and R. Atkinson, Security Architecture for the Internet Protocol, RFC2401, November 1998. https://tools.ietf.org/html/rfc2401.html ("RFC 2401").
1012	RFC793 – Information Science Institute, Transmission Control Protocol, September 1981 ("RFC 793").
1013	U.S. Patent No. 7,079,499 to Akhtar *et al.* ("Akhtar").
1014	U.S. Patent No. 7,174,018 to Patil *et al.* ("Patil").
1015	U.S. Patent No. 6,418,130 to Cheng *et al.* ("Cheng").
1016	Curriculum Vitae of Dr. David Goldschlag.
1017	Declaration of Sandy Ginoza for IETF (Regarding RFC2401 and RFC793).
1018	Declaration of Alexa Morris for IETF (Regarding "Mobility-aware IPsec ESP tunnels" by Dupont)

Apple (EX) Exhibit #	*Description*
1019	Transcript of the Deposition of Dr. George N. Rouskas, March 20, 2020 ("Rouskas Depo.")
1020	Declaration of Dr. David Goldschlag in Support of Petitioner's Reply to Patent Owner's Response ("Second Goldschlag Decl.")

I. Introduction

The Board should find unpatentable all claims of the ’810 patent because Apple has shown that the prior art renders all claims invalid. MPH raises no new arguments in its Patent Owner Response (POR), but rather repeats the unavailing arguments made in its Patent Owner Preliminary Response (POPR). The Board should again reject those arguments as it did in the Institution Decision. Essentially, MPH makes one argument as to why the combination of Ishiyama and Murakawa does not render obvious the claims of the ’810 patent—that Ishiyama’s “correspondent host” is not a “security gateway.” *See* POR, 27-45. But the Board should reject this argument because it is based on an improper and unnecessary claim construction, mischaracterizes Apple’s contentions, and ignores the teachings of Ishiyama and Murakawa.

II. The Board Should Reject MPH’s Improper Claim Construction

Disputed Constructions	
Apple	**Security gateway:** Plain and ordinary meaning.
MPH	**Security gateway:** “gateway that provides additional security functionality, such as firewall functionality.” POR, 12. **Gateway**: “an intermediary system with two or more communication interfaces that interconnects different networks and can forward packets it receives from one network on to another network.” POR, 11-12.

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