#### UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

MPH TECHNOLOGIES OY, Patent Owner.

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Case IPR2019-00820 Patent 7,937,581

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



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	rebetween" and Other Limitations
(a)	Multiple Publications from the Relevant Timeframe Confirm that a Correspondent Host as in Ishiyama is Not a Security Gateway as Claimed.
(b)	Ishiyama's Correspondent Host is Demonstrably Not a Security Gateway Because it is the Final Destination for the Packets It Receives
(c)	Ishiyama's Description of IPSec Processing Using the Security Databases Proves that the Correspondent Host is Not a Security Gateway
(d)	Petitioner's Theory that the Correspondent Host Must be a Security Gateway Because IPSec Tunnel Mode is Used is Incorrect
	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
(e)	Petitioner's Argument in this Proceeding that the Correspondent Host is a Security Gateway is Contradicted by the Position Taken in IPR2019-00821
Disc Terr	Petition Also Fails to Establish that the Prior Art loses the "Other Terminal" in "At Least One Mobile ninal and Another Terminal and a Security Gateway rebetween" and Other Limitations



		Address of the Security Gateway to Request the Security Gateway to Change the Secure Connection to Be Defined Between the Second Address and the Gateway Address of the Security Gateway"		
		4. The Petition Also Fails to Establish that the Prior Art Teaches the "Mobile Terminal Sending a Secure Message From the Second Address of the Mobile Terminal to the Other Terminal via the Security Gateway"		
	В.	Claim 4 is Patentable Over the Combination of Ishiyama and Murakawa Because the Petition Fails to Establish that the Prior Art Teaches the "Request Message And/Or a Reply Message is Encrypted And/Or Authenticated"		
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### **TABLE OF AUTHORITIES**

Page(s) CASES Continental Can Co. v. Monsanto Co., David Netzer Consulting Eng'r LLC v. Shell Oil Co., Graham v. John Deere Co., In re Robertson, InTouch Techs., Inc. v. VGO Commc'ns, Inc., 751 F.3d 1327 (Fed. Cir. 2014) .......55 KSR Int'l Co. v. Teleflex Inc., 127 S.Ct. 1727 (2007).......26 Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co., Personal Web Techs., LLC v. Apple, Inc., Pfizer, Inc. v. Apotex, Inc., 480 F.3d 1348 (Fed. Cir. 2007) .......26 Phillips v. AWH Corp., Regents of Univ. of California v. Broad Institute, Inc., 903 F.3d 1286 (Fed. Cir. 2018) .......26



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