UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MPH TECHNOLOGIES OY,
Patent Owner

Case IPR2019-00820
U.S. Patent No. 7,937,581

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

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Patent Trial and Appeal Board
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1002	Declaration of Dr. David Goldschlag in Support of Petition for *Inter Partes* Review of U.S. Patent No. 7,937,581 ("Goldschlag Decl.")
1003	Prosecution History of U.S. Patent No. 7,937,581 ("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	S. Frankel, Demystifying the IPsec Puzzle, Artech House, Inc., 2001 ("Frankel")
1009	W. Stallings, IP Security - The Internet Protocol Journal – Volume 3, No. 1, March 2000 ("Stallings")
1010	Mobility-aware IPsec ESP tunnels, Francis Dupont, IETF Draft Posted February 22, 2001 ("Dupont")
1011	RFC2401 - S. Kent, and R. Atkinson, Security Architecture for the Internet Protocol, RFC2401, The Internet Society, November 1998 ("RFC 2401")
1012	RFC793 - Transmission Control Protocol, Darpa Internet Program Protocol Specification, 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")
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1019	U.S. Patent No. 7,620,810 to Vaarala *et al.* ("Vaarala")

Apple (EX) Exhibit #	*Description*
1020	Prosecution History of U.S. Patent No. 7,620,810 ("'810 Prosecution History")
1021	Transcript of the Deposition of Dr. George N. Rouskas, March 20, 2020 ("Rouskas Depo.")
1022	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 ’581 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 ’581 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, 11. **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.

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