UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner

v.

MPH TECHNOLOGIES OY,
Patent Owner

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Case IPR2019-00823
U.S. Patent No. 9,712,494

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

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U.S. Patent & Trademark Office
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UPDATED EXHIBIT LIST

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1003	Prosecution History of U.S. Patent No. 9,712,494 B2 ("Prosecution History")
1004	RFC3104 - RSIP Support for End-to-end IPsec, The Internet Society (Oct. 2001) ("RFC3104")
1005	Prosecution History of U.S. Patent No. 8,346,949 B2 ("'949 Patent Prosecution History")
1006	U.S. Patent No. 7,032,242 B1 to Grabelsky *et al.*, issued Apr. 18, 2006 ("Grabelsky")
1007	Wagner *et al.*, Analysis of the SSL 3.0 Protocol, USENIX (Nov. 1996) ("Wagner")
1008	Declaration of Ms. Sandy Ginoza ("Ginoza Decl.")
1009	Declaration of James L. Mullins Ph.D. ("Mullins Decl.")
1010	Curriculum Vitae of James L. Mullins
1011	S. Frankel, "Demystifying the IPsec Puzzle," Artech House, Inc., 2001 ("Frankel")
1012	RSIP Support for End-to-end IPsec (RFC 3104), IETF Data Tracker (2000) ("IETF Data Tracker")
1013	RFC2026 - The Internet Standards Process -- Revision 3 (Oct. 1996) ("RFC2026")
1014	RFC2246 - The TLS Protocol Version 1.0 (Jan. 1999) ("RFC2246")

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1020	Zhang *et al*., "A Multu-Layer IPsec Protocol," (Aug. 2000) ("Zhang")
1021	Curriculum Vitae of David Goldschlag, Ph.D. ("Goldschlag CV")
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1023	Transcript of the Deposition of George N. Rouskas, Ph.D., May 7, 2020 ("Rouskas Dep.")
1024	Transcript of the Deposition of Michael S. Borella, Ph.D., May 18, 2020 ("Borella Dep.")
1025	Merriam-Webster's Collegiate Dictionary, Eleventh Edition (2003) ("Merriam-Webster's Dictionary")

I.   Introduction

Patent Owner ("MPH") presents a single argument in support of the patentability of the '494 patent's independent claim: that the prior art does not teach a "mobile computer," as recited in claim 1 of the '494 patent. This argument is premised on an improper and overly narrow construction of the term "mobile computer" which attempts to import numerous additional requirements into this basic term. The Board properly rejected similar attempts by MPH at the institution stage, and should continue to do so. A "mobile computer" is taught by RFC3104 under any reasonable interpretation of the term, and thus, the Board should find independent claim 1 unpatentable.

MPH's arguments against the dependent claims fare no better. Again, MPH attempts to import requirements into the claims that do not exist and mischaracterizes the Petition's arguments. For the reasons specified in the Petition and below, the Board should find the dependent claims unpatentable over the cited prior art.

II.   Claim Construction

A.   The Board should reject MPH's improper construction of "mobile computer."

"mobile computer"	
MPH's Proposed Construction	"a computer that moves from one network to another as opposed to a computer that is only capable of a static secure connection"

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