UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS AMERICA, INC.

Petitioner

v.

UNILOC 2017 LLC

Patent Owner

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IPR2019-01218

PATENT 6,836,654

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PATENT OWNER PRELIMINARY RESPONSE TO PETITION

PURSUANT TO 37 C.F.R. §42.107(a)

Table of Contents

LIST OF EXHIBITS

No.	Description
2001	*Uniloc 2017 LLC v. Samsung Elecs. Am., Inc.*, No. 2:18-00508, Docket Control Order, D.I. 20 (E.D. Tex.)
2002	Exhibit A-1 to Samsung Invalidity Contentions, *Uniloc 2017 LLC v. Samsung Elecs. Am., Inc.*, No. 2:18-00508 (E.D. Tex.)
2003	Exhibit B to Samsung Invalidity Contentions, *Uniloc 2017 LLC v. Samsung Elecs. Am., Inc.*, No. 2:18-00508 (E.D. Tex.)

I.   INTRODUCTION

Uniloc 2017 LLC ("Uniloc" or "Patent Owner") submits this Preliminary Response to Petition IPR2019-01218 for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 6,836,654 ("the '654 patent" or "EX1001") filed by Samsung Electronics America, Inc. ("Petitioner"). The instant Petition is defective for at least the reasons set forth herein.

II.   THE '654 PATENT

The '654 patent is titled "Anti-theft protection for a radiotelephony device." The '654 patent issued December 28, 2004, from U.S. Patent Application No. 09/739,507 filed December 18, 2000, claiming priority to French application 99-16136, filed December 21, 1999.

Figure 3 of the '654 patent, reproduced below, is a flow chart depicting an example embodiment.
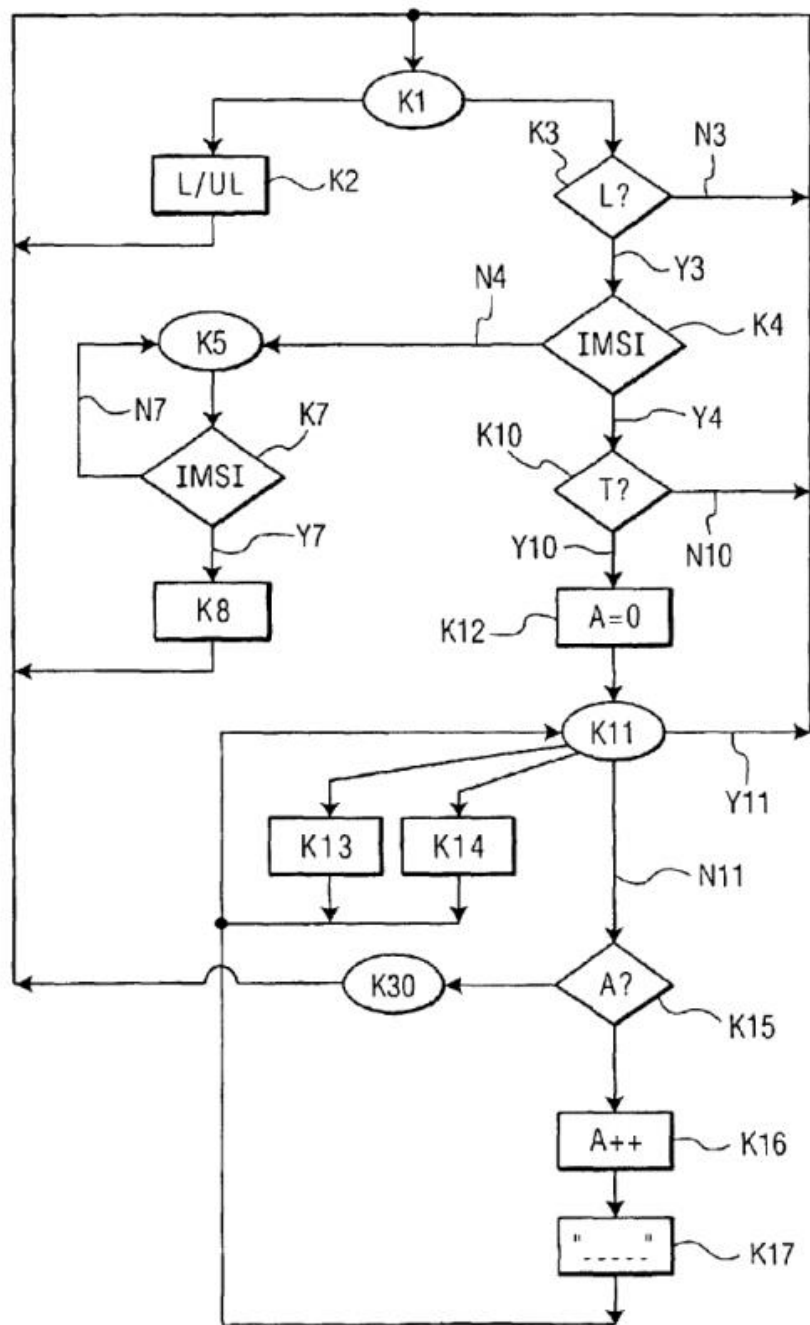
FIG. 3

The text accompanying Figure 3 describes operation from box K1 at the top of the figure, in which the device is in a state of availability, through various blocking states (K5, K11, K30) and decisional nodes related to these blocking states. *See*

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