

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**ZTE (USA) INC.,**

Petitioner,

v.

**BELL NORTHERN RESEARCH, LLC,**

Patent Owner.

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PTAB Case No. IPR2019-01365

Patent No. 7,039,435

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,039,435  
Claims 1–3 and 6**

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**EXHIBIT LIST**

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Pat. No. 7,039,435 to McDowell et al. (“the ’435 patent”)
1002	File History of the ’435 Patent
1003 <sup>1</sup>	Declaration of Dr. Jonathan Wells
1004	Certified English Translation of European Patent Publication EP 1091498 by Baiker (“Baiker”)
1005	U.S. Patent No. 6,456,856 to Werling (“Werling”)
1006	PCT Patent Publication WO 2002/05443 by Irvin (“Irvin”)
1007	U.S. Patent No. 6,018,646 to Myllymäki (“Myllymäki”)
1008	U.S. Pat. No. 5,390,338 to Bodin (“Bodin”)
1009	Joint Claim Construction Chart, Worksheet, and Hearing Statement in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1010	U.S. Provisional Patent Application No. 09/612,034 by Irvin (“Irvin Provisional”)
1011	Michael Barr, <i>Programming Embedded Systems in C and C++</i> (O’Reilly & Associates, 1999)
1012	Rudolf F. Graf, <i>Modern Dictionary of Electronics</i> (Butterworth-Heinemann, 1999)
1013	Harry Newton, <i>Newton’s Telecom Dictionary</i> (Miller Freeman, Inc., 1999)
1014	Webster’s II New College Dictionary (Houghton Mifflin Co, 1999)
1015	Martin H. Weik, <i>Fiber Optics Standard Dictionary</i> (Chapman & Hall, 1997)
1016	European Patent Publication EP 1091498 (“Baiker”)
1017	Webster’s New World College Dictionary (Simon & Schuster, 1997)

<sup>1</sup> Exhibit 1003 is a verbatim copy of the Declaration of Jonathan Wells submitted on behalf of Petitioner Huawei in support of their Petition for *Inter Partes* Review of the 7,039,435 patent in IPR2019-01186.

Exhibit	Description
1018	U.S. Patent No. 6,029,074 to Irvin (“Irvin ’074”)
1019	Defendants’ Joint Opening Claim Construction Brief in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1020	Plaintiff’s Opening Claim Construction Brief in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1021	Supplemental Joint Claim Construction Hearing Statement Pursuant to P.L.R. 4.2 in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1022	Defendants’ Joint Responsive Claim Construction Brief in <i>Bell Northern Research, LLC v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1023	Plaintiff’s Responsive Claim Construction Brief in <i>Bell Northern Research, LLC v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)
1024	Redline Comparison of this Petition and Petition filed in IPR2019-01186 (“Huawei IPR”)

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