

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SLING TV L.L.C.

Petitioner

v.

UNILOC 2017 LLC

Patent Owner

IPR2019-01367

PATENT 8,407,609

PATENT OWNER RESPONSE TO PETITION

PURSUANT TO 37 C.F.R. § 42.120

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2002	Claim Construction Memorandum and Order, <i>Uniloc 2017 LLC v. Google LLC</i> , Case No. 2:18-CV-00502-JRG-RSP, Dkt. 149 (E.D. Tex. Jan. 20, 2020) (adopted Dkt. 198, Mar. 24, 2020)

I. INTRODUCTION

Uniloc 2017 LLC (“Uniloc” or “Patent Owner”) submits this Response to Petition IPR2019-01367 for *Inter Partes* Review (“Pet.” or “Petition”) of United States Patent No. 8,407,609 (“the ‘609 patent” or “EX1001”) filed by Sling TV L.L.C. (“Petitioner”).

In view of the reasons presented herein, the Petition should be denied in its entirety, as Petitioner has failed to meet its burden of showing that any challenged claim is unpatentable. 35 U.S.C. § 316(e).

Uniloc addresses each ground and provides specific examples of how Petitioner failed to establish that any of the challenged ‘609 Patent claims is unpatentable. As a non-limiting example described in more detail below, the Petition fails to show that the cited art teaches every feature of any of the challenged claims.

Accordingly, Uniloc respectfully requests that the Board find that Petitioner has failed to carry its burden of proof that any of Claims 1-3 of the ‘609 Patent are unpatentable.

II. THE ‘609 PATENT

A. Effective Filing Date of the ‘609 Patent

The ‘609 patent is titled “System and method for providing and tracking the provision of audio and visual presentations via a computer network.” The ‘609 patent issued March 26, 2013, from U.S. Patent Application No. 12/545,131 filed

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